

# **Exhibit 1**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CASE NO.: 1:19-CV-09156 (LTS) (KHP)

- - - - - x

GRAHAM CHASE ROBINSON,

Plaintiff,

- against -

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

- - - - - x

ZOOM VIDEOCONFERENCE DEPOSITION OF

ROBERT DE NIRO

April 4, 2022

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ZOOM VIDEOCONFERENCE ORAL DEPOSITION OF  
ROBERT DE NIRO, taken pursuant to Notice,  
commencing April 4, 2022, at 10:07 a.m., on the  
above date, before Catherine M. Donahue, a  
Certified Court Reporter and Notary Public in the  
State of New Jersey.

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A P P E A R A N C E S:  
(All parties present via Zoom Remote)

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A P P E A R A N C E S: (Cont'd)  
(All parties present via Zoom Remote)

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A P P E A R A N C E S: (Cont'd)  
(All parties present via Zoom Remote)

ALSO PRESENT:  
Chris Allen, Magna Videographer/Tech  
Annie Sloan, Sanford Heisler Sharp, LLP  
Jeremy Margolis, Sanford Heisler Sharp, LLP  
Leor Rosen, Sanford Heisler Sharp, LLP  
Simon Schaitkin, Sanford Heisler Sharp, LLP  
Graham Chase Robinson  
Tom Harvey, Esq.

2 (Pages 2 to 5)

## FEDERAL STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for the respective parties herein, that the filing and sealing be and the same are hereby waived.

IT IS FURTHER STIPULATED AND AGREED that all objections except as to the form of the question shall be reserved until the time of trial.

IT IS FURTHER STIPULATED AND AGREED that the within deposition may be sworn to and signed before any officer authorized to administer an oath, with the same force and effect as if signed and sworn to before this Court.

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THE VIDEOGRAPHER: We are now on the record. This begins video No. 1 in the deposition of Robert De Niro, in the matter of Graham Chase Robinson versus Robert De Niro and Canal Productions, Incorporated.

Today is Monday, April 4, 2022, and the time is 10:07 a.m. This deposition is being taken remotely via video conferencing software at the request of Sanford Heisler Sharp.

The videographer is Chris Allen of Magna Legal Services and the court reporter is Catherine Donahue also of Magna Legal Services.

At this time, will counsel and all parties present state their appearances and whom they represent.

MR. SANFORD: David Sanford of Sanford Heisler Sharp representing Chase Robinson, the plaintiff.

MR. HEISLER: Jeremy Heisler of Sanford Heisler Sharp representing plaintiff Chase Robinson.

MS. HARWIN: Alexandra Harwin

from Sanford Heisler Sharp, also representing plaintiff Graham Chase Robinson.

MS. MAC MULLIN: Kate Mac Mullin from Sanford Heisler Sharp, also representing plaintiff Graham Chase Robinson.

MS. SLOAN: Annie Sloan, Sanford Heisler Sharp for the plaintiff Graham Chase Robinson.

MR. SCHAITKIN: Simon Schaitkin from Sanford Heisler Sharp for the plaintiff Graham Chase Robinson.

MR. MARGOLIS: Jeremy Margolis from Sanford Heisler Sharp for plaintiff Graham Chase Robinson.

MS. ROSEN: Leor Rosen for Sanford Heisler Sharp for plaintiff Graham Chase Robinson.

MR. BENNETT: Gregory Bennett, Traub Lieberman Straus & Shrewsberry, counsel for defendant.

MR. DROGIN: Laurent Drogen, Tarter Krinsky & Drogen for defendant Canal Productions, Inc.

MS. LAZZARO: Brittany Lazzaro from Tarter Krinsky & Drogen for Canal Productions, Inc.

MR. HARVEY: Tom Harvey for the defendant.

THE WITNESS: I don't have a mouse that works on this computer. I'm trying to get it.

MR. SANFORD: Let's go off the record while we fix this.

THE VIDEOGRAPHER: The time is 10:09 a.m.

(Whereupon, at 10:09 o'clock a.m., a recess was taken until 10:10 o'clock a.m.)

THE VIDEOGRAPHER: The time is 10:10 and we are back on the record.

At this time, will the court reporter please swear in the witness.

(The witness is sworn by the court reporter.)

ROBERT DeNIRO, called as a witness by (Plaintiff), having been first duly sworn by Catherine M. Donahue, a Notary Public within and for the State of New

Jersey, was examined and testified as follows:

EXAMINATION BY MR. SANFORD:

Q. My name is David Sanford and I'm an attorney at Sanford Heisler Sharp, and I represent plaintiff Graham Chase Robinson in this lawsuit.

It is a pleasure to meet you, Mr. De Niro, although I'm sorry it is under those circumstances.

A. Thank you. So am I.

Q. Thank you for being here today.

Before we begin, I'm going to explain to you some ground rules for your deposition. I'm going to ask you questions, and both my questions and your answers will be recorded by the court reporter. Both of us need to speak up and speak clearly and slowly so that the court reporter can record everything.

You understand that, right?

A. Uh-hum. Yes.

Q. Also, you must answer verbally because the court reporter cannot record a nod or a shake of the head. And even though we're on video, it is important to have a clean

1 transcript.

2 Okay?

3 A. Okay.

4 Q. And until I finish my question, I  
5 would ask you to wait before you start  
6 answering.

7 If you need a break at any time or  
8 for any reason, let me know. And you'll finish  
9 your answer if I have a pending question. If  
10 we're in the middle of that question, I'll ask  
11 you to answer and then you can take your break.

12 A. Okay.

13 Q. And your attorney will object from  
14 time to time, but unless he instructs you not to  
15 answer the question, you should answer my  
16 question.

17 You understand that, right?

18 A. If he instructs me not to answer, I  
19 should answer anyway?

20 Q. No. If he instructs you not to  
21 answer, you won't answer.

22 A. Oh, I see.

23 Q. But if he just objects, you're still  
24 expected to answer the question.

25 A. Okay.

1 Q. If you answer a question and later  
2 on you remember some additional information or  
3 would like to clarify something, please let me  
4 know that you would like to add something or  
5 clarify something and I'll give you the  
6 opportunity to do so.

7 A. Okay.

8 Q. When I refer to Canal, I'm referring  
9 to Canal Productions. If you're unsure about  
10 what I mean by any term that I use throughout  
11 the day and tomorrow, please let me know.

12 A. Okay.

13 Q. The testimony you're about to give  
14 is under oath, just as if you were in a court of  
15 law. The testimony may be used as evidence in  
16 this case.

17 You understand that, right?

18 A. Yes.

19 Q. Do you have any electronic screens  
20 or communication devices with you in the room  
21 you're in right now?

22 A. No. I have my iPhone, but I'm  
23 not -- it is just there.

24 Q. Okay.

25 Is your iPhone off?

1 A. Yes, I'll turn it to mute.

2 Q. Thank you.

3 Do you ever use an earpiece?

4 A. Sometimes.

5 Q. Do you have an earpiece in either or  
6 both of your ears at this point?

7 A. No.

8 Q. If you use an earpiece at any time  
9 during this deposition, would you please let me  
10 know?

11 A. Sure. Well, you can see if I'm  
12 using one.

13 Q. Well, it is hard to see. It is a  
14 little shaded. Good ear pieces you can't see  
15 anyway, right?

16 A. That's right.

17 Q. Is there anyone in the room with you  
18 today?

19 A. No.

20 Q. And you understand your obligation  
21 is to provide testimony that is truthful and  
22 complete, right?

23 A. Yes.

24 MR. SANFORD: Will your counsel  
25 adhere today to agree to reserve all

1 objections as to the form for trial?

2 MR. DROGIN: For Canal  
3 Productions, yes.

4 MR. BENNETT: Yes, for defendant.

5 MR. SANFORD: And will you agree  
6 to have a standing objection to all  
7 questions I pose identical to the  
8 standing objection agreement we entered  
9 into this case with respect to Chase  
10 Robinson's deposition?

11 A. Sorry, you're asking me?

12 MR. SANFORD: No, counsel.

13 MR. DROGIN: I'm sorry, can you  
14 repeat it?

15 MR. SANFORD: Would you agree to  
16 have a standing objection to all the  
17 questions I pose just for efficiency  
18 sake so we can have a clean record and  
19 be efficient here?

20 You entered into a stipulation  
21 with respect to during the Chase  
22 Robinson deposition, to have a standing  
23 objection to all objections as to form.

24 I'm just wondering if you would  
25 do the same here.

1 MR. DROGIN: Okay, I mean from my  
2 perspective, let's see how it goes and  
3 then counsel can confer and let you  
4 know.

5 So we'll take it under  
6 advisement.

7 MR. SANFORD: That's fine.

8 BY MR. SANFORD:

9 Q. All right.

10 Mr. De Niro, back to you. What is  
11 your full name?

12 A. Robert Anthony De Niro.

13 Q. Have you ever gone by any other  
14 name?

15 A. No.

16 Q. What is your date of birth?

17 A. [REDACTED]

18 Q. What is your home address?

19 A. Can I do my office address?

20 Q. You don't have home address?

21 A. I have, but I don't like -- I don't  
22 know. I have some privacy -- or does it matter?

23 Q. You're expected to answer all my  
24 questions. And if your counsel thinks that  
25 there's some issue about confidentiality that he

1 would like to take up with the court, he is free  
2 to do so.

3 MR. BENNETT: We will designate  
4 this part of the deposition as  
5 confidential, Bob.

6 A. Okay. [REDACTED]

7 BY MR. SANFORD:

8 Q. How long have you resided at that  
9 address?

10 A. A few years.

11 Q. By a few, you mean how many?

12 A. About, I would say, three, three  
13 something.

14 Q. Do you remember when you moved into  
15 that address?

16 A. Three, three and a half years ago.  
17 I can't remember exactly. Something around that  
18 time.

19 Q. What is your educational background?

20 A. I didn't graduate high school. Went  
21 to acting school. That's it.

22 Q. Do you live alone?

23 A. I live with someone.

24 Q. Who do you live with?

25 THE WITNESS: Is that necessary

1 for me to tell them this?

2 MR. DROGIN: Yes.

3 BY MR. SANFORD:

4 Q. You're expected to answer my  
5 question, sir.

6 A. I know that, but I still want to  
7 question -- you're not on my side, so I don't  
8 expect you to ask me any question that will be  
9 in my favor.

10 Tiffany Chen.

11 Q. What is your relationship with  
12 Ms. Chen?

13 A. She's my girlfriend.

14 Q. And when did Ms. Chen begin living  
15 with you?

16 A. A few years ago. About the same  
17 time that I moved in.

18 Q. At the time that she moved in, were  
19 you married?

20 A. Yes.

21 Q. To whom?

22 A. Going through a divorce.

23 Q. You were going through a divorce at  
24 the time Ms. Chen moved in?

25 A. Uh-hum.

1 Q. Is that a "yes"?

2 A. That's a "yes".

3 Q. And how many times have you been  
4 married?

5 A. This -- three.

6 Q. Who was your first marriage?

7 A. To Diahnne Abbott.

8 Q. When did you marry Ms. Abbott?

9 A. That was 46 years ago.

10 Q. How long were you married to  
11 Ms. Abbott?

12 A. We were married about 10, 12, 13, 14  
13 years. But we had split up earlier. But we  
14 finally got divorced.

15 Q. And who was your second wife?

16 A. Grace Hightower.

17 Q. When did you marry her?

18 A. Maybe about 26 years, 27 years ago.

19 Q. How long were you married to  
20 Ms. Hightower?

21 A. I was married for a few years and  
22 then I got divorced. Then I remarried Hightower  
23 a few years later.

24 Q. And are you still married to  
25 Ms. Hightower at this point?

1 A. Technically I am, but I am going  
2 through a divorce.

3 Q. And when did you become -- when did  
4 Ms. Chen become your girlfriend?

5 A. A few years ago. Three or four  
6 years ago.

7 Q. Do you have any children?

8 A. Yes.

9 Q. What are their names?

10 A. [REDACTED]

24 Q. Do you suffer from any condition  
25 that affects your memory?

1 A. No.

2 Q. Have you consumed any alcohol or  
3 drugs, including prescription drugs, in the last  
4 48 hours?

5 A. No.

6 Q. Do you typically take [REDACTED]

7 A. Yes, that I do from time to time.

8 Q. Did you take [REDACTED] within the last  
9 48 hours?

10 A. No.

11 Q. Do you typically take [REDACTED]?

12 A. No.

13 Q. [REDACTED]

14 A. No.

15 Q. [REDACTED]

16 A. No.

17 Q. [REDACTED]

18 A. From time to time. Rarely.

19 Q. Did you take it within the last 48  
20 hours?

21 A. No.

22 Q. Have you consumed any substances at  
23 all that may affect your memory or ability to  
24 communicate today?

25 A. No.

1 Q. Is there any reason physically or  
2 mentally that you are not able to testify today  
3 truthfully and completely?

4 A. No.

5 Q. Other than this case, have you ever  
6 been involved in any other lawsuit or any other  
7 judicial arbitral or administrative proceeding  
8 as a party or a witness?

9 A. Oh, I'm forgetting, there was one --  
10 which one. There was one with Tom Harvey many,  
11 many years ago.

12 Someone tried to shake me down and  
13 they lost that -- I don't know what you call  
14 it -- attempt to at the time to shake me down.  
15 I can't remember. There's nothing, nothing that  
16 I can remember, but maybe somebody can remind  
17 me. I just don't.

18 Q. Do you remember, do you remember the  
19 name of the person who tried to shake you down?

20 A. No.

21 Q. Do you remember the circumstances of  
22 that shakedown?

23 A. They said that I had hit them when I  
24 told them not to take a video of me, and I  
25 didn't hit them. I held their camera and they

1 bent over the hood of a car, and then the next  
2 morning they somehow issued -- said that -- I  
3 don't know what it is called, but the police  
4 were looking for me and someone called me and  
5 said they're looking for you.

6 And so, I got a hold of Tom Harvey  
7 and went down and did what I had to do with this  
8 person and that it was it. I didn't do  
9 anything. It was just that they did that, so I  
10 had to go along with it.

11 Q. Was that a case that was filed in  
12 court, do you know? Was a lawsuit filed against  
13 you?

14 A. Tom Harvey can give you more details  
15 about that. I don't think it went that far.

16 Q. Well, you know, today I'm asking you  
17 questions, not Tom Harvey. And I just want to  
18 know to the best of --

19 A. I don't have the answer to that.  
20 All I know is that the photographer was  
21 embarrassed because they tried to shake me down.

22 They went to see the DA. The DA  
23 said, "Are you withdrawing charges?" They said  
24 yes. That was after they had just been given a  
25 couple hundred thousand dollars to drop the



1 case.

2 So the rest you can figure out for  
3 yourself.

4 Q. So you paid, you paid the  
5 photographer a couple hundred thousand dollars?

6 A. I attempted to pay and he attempted  
7 to take it, and so -- and it was videotaped.

8 Q. And so, what was the ultimate  
9 resolution of that case? How did it end?

10 A. My feeling is that he was told if he  
11 does this -- does anything else, blah, blah,  
12 blah, he will be, you know -- we have this on  
13 record, extortion, what he tried to do, and  
14 things will happen accordingly.

15 Q. You never testified in that case, to  
16 your recollection?

17 A. No, no.

18 Q. Were you involved in any other  
19 matter, legal matter that involved you as a  
20 witness or as a party?

21 A. Well, there was a guy, an art dealer  
22 of my father's named Larry Salander, who was  
23 trying to -- who was starting to get -- I was  
24 hearing that he was stealing and taking  
25 paintings, double selling them. Sort of ripping

1 off other clients who had art with him, dealers  
2 in Italy.

3 And I had asked him about it, I  
4 think, and he denied it, of course. And then, I  
5 didn't want to get involved.

6 And then finally, they were -- the  
7 police were asking if I would do a grand jury  
8 testimony and I said -- I was resisting it. I  
9 just felt bad about the whole thing. I didn't  
10 want to be, you know...

11 But then, they showed me so much  
12 sort of evidence, things that he had done that I  
13 felt it was my obligation to go before the grand  
14 jury, which I did.

15 Q. Okay.

16 Any other matters involving you as a  
17 witness or a party to a lawsuit?

18 A. I can't remember. I just can't  
19 remember.

20 Q. You were a party to a lawsuit in  
21 your divorce, right?

22 A. A lawsuit in my divorce, you mean?

23 Q. Your divorce is a judicial  
24 proceeding, right, and you're a party --

25 A. If that's a lawsuit, then I guess I

1 am, yes.

2 Q. You're a party in that, right?

3 A. I'm a party, yes.

4 Q. And did you testify in your divorce  
5 proceedings with Ms. Hightower?

6 A. I didn't testify. We had, we had  
7 meetings with the judge in his chambers. I  
8 might have made a few, like, "Do you promise to  
9 tell the truth" and swore an oath and blah,  
10 blah, blah.

11 There was nothing else that I  
12 remember. There was no big court proceeding  
13 other than trying to, I guess, work things out  
14 privately because children were involved, are  
15 involved.

16 Q. Have you ever provided any testimony  
17 or given any sworn statements in a case  
18 involving Canal Productions?

19 A. I don't remember.

20 Q. You might have; you're not sure?

21 A. I don't know. I just don't  
22 remember. There might have been some -- if it  
23 was, it would be some minor technical type thing  
24 that they need me to -- and I'm not even sure of  
25 that.

1 Q. What is Canal Productions?

2 A. It is a production company that I  
3 started many years ago.

4 Q. And what's your role at Canal  
5 Productions?

6 A. They loaned me out to other film  
7 companies when I'm working as an actor or  
8 director or whatever.

9 Q. Is it fair to say that you run Canal  
10 Productions?

11 A. You could say that, yes, of course.

12 Q. Have there ever been any written  
13 policies at Canal?

14 A. I don't think so, but there might  
15 have been. I don't really think so.

16 Q. Have you ever been interviewed by  
17 the police or any other law enforcement  
18 personnel?

19 MR. DROGIN: Objection to the  
20 form.

21 Go ahead and answer.

22 A. Something here or there, yes.

23 BY MR. SANFORD:

24 Q. Something here or there, what is  
25 that?



1 she [REDACTED]

3 Do you remember that?

4 MR. DROGIN: Counsel -- hold on,  
5 Bob.

6 Counsel, objection to the form,  
7 and I'm going to direct him not to  
8 answer.

9 We have given you a tremendous  
10 amount of leeway here, but you're now  
11 asking questions about a pending civil  
12 litigation that involves [REDACTED]

13 So he's not going to answer  
14 further questions about that matter.

15 (Whereupon, the transcript  
16 was marked for a direction not to  
17 answer.)

18 A. I have a question. I wonder why you  
19 guys even have this case, because, I mean, I  
20 know lawyers have ethics, some ethics.

21 I know you defend people. You  
22 represent them. I guess you felt this one was  
23 where you could just take a shot.

24 You know, I know Chase Robinson is  
25 not paying you anything. Pro bono. Maybe

1 you'll get lucky with me and I'll give in or  
2 you'll find something and good luck, you know.

3 But this is such a waste of time for  
4 me, my life, my family. What I did for Chase  
5 Robinson. I trusted her, and this is what I  
6 get. So I'll take it, you know. You think  
7 you'll make a score with me.

8 BY MR. SANFORD:

9 Q. [REDACTED]

10 MR. DROGIN: Objection.

11 Direct the witness not to answer.

12 He's not going to answer that question.

13 He's not going to answer further  
14 questions about pending litigation.

15 (Whereupon, the transcript  
16 was marked for a direction not to  
17 answer.)

18 BY MR. SANFORD:

19 Q. [REDACTED]

22 MR. DROGIN: Same objection.

23 Hold on. Direct the witness not to  
24 answer. We're done answering questions  
25 about Ms. Hightower.

1 (Whereupon, the transcript  
2 was marked for a direction not to  
3 answer.)

4 BY MR. SANFORD:

5 Q. Mr. De Niro, are you going to follow  
6 your lawyer's instruction not to answer the  
7 question?

8 A. Yes, I am.

9 Q. Do you have something to hide with  
10 respect to Ms. Hightower?

11 A. I have nothing to hide, but it is  
12 none of your business and it is not relevant to  
13 what we're talking about this whole case.

14 Q. Well, actually it is, but that's for  
15 another day.

16 A. Really, I would like to see you  
17 connect it.

18 MR. DROGIN: All right.

19 Let's move forward with questions  
20 and answers.

21 MR. SANFORD: Okay.

22 For the record, Mr. Drogin, it is  
23 not a proper objection to direct the  
24 witness not to answer a question like  
25 that. You know that. I know that. And

1 that's going to be subject to a future  
2 motion.

3 But you and I will discuss --

4 MR. BENNETT: Well, let's dispute  
5 it right now.

6 MR. DROGIN: The judge is  
7 standing by. The judge has been alerted  
8 that there may be directions not to  
9 answer, so if you want to get it  
10 resolved now, we can get it resolved  
11 now.

12 If you don't want to get it  
13 resolved now, our position is that you  
14 have waived it.

15 MR. SANFORD: I understand.

16 Well, you can take that position.

17 MR. DROGIN: I am.

18 BY MR. SANFORD:

19 Q. Mr. De Niro, have you ever been  
20 convicted of a criminal offense?

21 A. No.

22 MR. DROGIN: That, you can  
23 answer.

24 Go ahead.  
25

1 BY MR. SANFORD:

2 Q. Have you ever been charged or  
3 arrested in correction with a criminal offense?

4 MR. BENNETT: Objection to form.  
5 You can answer.

6 A. No.

7 BY MR. SANFORD:

8 Q. Have you ever been investigated by  
9 any domestic or foreign tribunal for wrongdoing?

10 A. No.

11 MR. DROGIN: Objection to the  
12 form.

13 Go ahead.

14 BY MR. SANFORD:

15 Q. Your testimony is you have never  
16 been investigated by a foreign tribunal for any  
17 wrongdoing?

18 MR. BENNETT: Objection to form.  
19 You can answer the question.

20 A. No.

21 BY MR. SANFORD:

22 Q. Were you ever asked questions in  
23 France about potential wrongdoing?

24 MR. BENNETT: Objection.

25 A. Yes, that -- I was asked questions.

1 And again, your job is to get me on  
2 something. There was nothing. It never should  
3 have happened, but that's what you would expect  
4 me to say. But it happens to be the truth,  
5 so...

6 BY MR. SANFORD:

7 Q. So when I asked you whether you had  
8 ever been investigated by any domestic or  
9 foreign tribunal for wrongdoing and you answered  
10 no, you forgot --

11 A. Yes, I did answer no. My apologies.

12 Q. May I finish? May I finish just so  
13 we have a clear record?

14 When I asked you have you ever been  
15 investigated by any domestic or foreign  
16 tribunal for wrongdoing, and you answered no,  
17 you forgot about the event in Paris, in France?

18 A. I did forget about it. It was such  
19 a non-event for me that I forgot about it. If  
20 you brought it up -- yes, you reminded me.  
21 Thank you.

22 Q. All right.

23 So now that I have reminded you and  
24 you remember, tell me about that.

25 A. They were trying to connect me to

1 some people who had been doing things that I  
2 knew nothing about.

3 And it was -- as far as I am  
4 concerned, was concerned, it was almost to  
5 harass me or -- I don't know what it was, but  
6 there was nothing there because if there was, I  
7 would have been -- something would have happened  
8 to me. But there was nothing there so. That's  
9 it. Zero.

10 Q. What were the -- was this the police  
11 in France trying to connect you with things?

12 A. Yes.

13 Q. What were they trying to connect you  
14 with?

15 A. I don't know. [REDACTED]

16 [REDACTED] But I think after  
17 many hours of questioning, they saw that I  
18 didn't know anything about that.

19 Q. I don't know what that means.

20 [REDACTED]  
21 [REDACTED]  
22 A. That's my -- and then I talked to a  
23 judge then who oddly had his own scandal, which  
24 I find -- I found ironic.

25 But in any case, I don't know. At

1 the end of the day, there was nothing there.  
2 There wasn't anything specific that they -- I  
3 don't know what it was all about, because all it  
4 was about, was that I was pulled in, asked  
5 questions and let go and that was it.

6 Q. What were the questions you were  
7 asked?

8 A. I forget the questions. If I knew  
9 this person or that person.

10 Q. What does it mean to be questioned  
11 about a -- about [REDACTED]

12 [REDACTED]  
13 A. I don't know.

14 MR. DROGIN: Objection.  
15 Objection to the form.

16 You can answer.

17 BY MR. SANFORD:

18 Q. You don't know?

19 MR. DROGIN: You can answer.

20 A. No, I don't know what it was. I  
21 don't know specifically exactly because I didn't  
22 know what they were really -- I knew nothing  
23 about it.

24 BY MR. SANFORD:

25 Q. Well, but you said there were [REDACTED]

1 [REDACTED] I'm wondering what that means.  
 2 Was that a [REDACTED]  
 3 you're talking about?

4 A. I don't know if it was a [REDACTED]  
 5 [REDACTED]

7 But again, I did not know anything  
 8 about it, so...

9 Q. What was the result of that  
 10 investigation?

11 A. Nothing.

12 Q. I'm sorry?

13 A. Nothing, as far as I know.

14 Q. Have you ever shot yourself in the  
 15 hand with your own gun?

16 A. No.

17 Q. Who is your counsel in this matter?

18 A. In which matter?

19 Q. In the matter of Chase Robinson  
 20 versus you.

21 MR. DROGIN: Objection to the  
 22 form.

23 You can answer.

24 A. Who is the counsel what?  
 25

1 BY MR. SANFORD:

2 Q. Who is the attorney who represents  
 3 you in the matter of Chase Robinson against you?

4 MR. DROGIN: Same objection to  
 5 the form.

6 Go ahead and answer.

7 A. I don't understand the question.

8 BY MR. SANFORD:

9 Q. Well, you know you're here in  
 10 connection with a lawsuit, correct?

11 A. Yes.

12 Q. And you know that lawsuit involves  
 13 claims brought by Ms. Robinson against you,  
 14 correct?

15 A. Yes.

16 Q. And you know that you're represented  
 17 in that matter, correct?

18 A. Yes.

19 Q. Who represents you?

20 A. Tom Harvey. My attorney, Laurent.

21 Q. Can you give me his full name,  
 22 please?

23 A. I don't know his full name.

24 MR. DROGIN: The record should  
 25 reflect that it is displayed on the

1 screen.

2 BY MR. SANFORD:

3 Q. You don't, you don't know your  
 4 lawyer's name?

5 A. No, I don't know his full name.

6 Q. Is Tom Harvey your lawyer in this  
 7 lawsuit and other matters or just for this  
 8 lawsuit, do you know?

9 A. In other matters.

10 Q. And is Laurent, whose last name you  
 11 don't remember, your attorney in this lawsuit  
 12 and other matters or just this matter?

13 A. In other matters, too.

14 Q. What other matters?

15 A. He knows that better than I do. It  
 16 may be labor, or this and that. And I suppose  
 17 that's why he's in this, because of Chase  
 18 Robinson.

19 Q. So you don't know for sure why  
 20 Laurent, whose last name you don't know, is  
 21 representing you in this matter?

22 A. No, I know he's representing me  
 23 because he's protecting me from the likes of  
 24 you, Chase Robinson, who must have given you a  
 25 good story about how she was picked upon and how

1 she was this and that and which is really, you  
 2 know -- I don't know. It is just pathetic.

3 But you guys took the case and you  
 4 want to prove something. You want to nail me on  
 5 something so that you can say -- and that's just  
 6 not going to happen because there's nothing  
 7 there.

8 Q. Has anyone --

9 A. Fire away. Fire away.

10 Q. Has anyone besides Chase Robinson  
 11 ever accused you of -- or Canal of any  
 12 wrongdoing?

13 MR. BENNETT: Objection.

14 A. I don't think so. There is people  
 15 who are always complaining, but not that I know  
 16 of who work for me or worked for me.

17 BY MR. SANFORD:

18 Q. What have you done to prepare for  
 19 today's deposition?

20 A. I talked to my lawyers.

21 Q. When you say you talked to your  
 22 lawyers, who did you speak with?

23 A. I spoke to Tom Harvey and Laurent a  
 24 little bit.

25 Q. Okay.



1 When did you speak with Mr. Harvey  
2 about this deposition?  
3 A. When?  
4 Q. When.  
5 A. A couple times. He reminds me,  
6 tells me that this, you know, is coming up.  
7 Q. And when you say a couple times, you  
8 mean two?  
9 A. Two, three, yes. You know, it is  
10 coming up. You know, everybody knows, so...  
11 Q. And how much time have you spent  
12 with Mr. Harvey in total preparing for this  
13 deposition?  
14 A. Not a lot.  
15 Q. Can you estimate how many hours?  
16 A. An hour, maybe. An hour and maybe  
17 15 minutes.  
18 Q. And what about Laurent, whose last  
19 name you don't know, how much time have you  
20 spent with him?  
21 A. That's about it, what I just said.  
22 Q. So you met with them together?  
23 A. Yes.  
24 MR. BENNETT: Objection.  
25

1 deposition?  
2 A. Nothing. Nobody feels like talking  
3 about it. It is just like -- it is like talking  
4 about something where you really -- it is sort  
5 of unsavory and so kind of low that you just say  
6 let's just move on.  
7 It is a low point in my life of  
8 having to be subjected to this kind of thing.  
9 If I deserve it, I deserve it, and I would be  
10 the first to say it.  
11 If I don't deserve it, you can't  
12 blame me for feeling a little annoyed by all of  
13 this.  
14 I tried to do the best thing for  
15 Chase. I do what you call the honor system. Do  
16 the right thing by me; I do the right thing by  
17 you. Don't shake me down, don't threaten me,  
18 try to intimidate me.  
19 This is to me a pathetic situation  
20 that we're all going through and a lot of -- and  
21 a big waste of time and money.  
22 So you can't blame me for being  
23 annoyed.  
24 Q. Do you know that Dan Harvey was  
25 deposited in this matter?

1 BY MR. SANFORD:  
2 Q. Was anyone else present when you met  
3 with them or were you just with the two lawyers?  
4 A. Just them.  
5 Q. Did you meet in person or was this  
6 by phone?  
7 A. We met on Zoom.  
8 Q. Have you spoken with anyone else  
9 regarding your deposition?  
10 A. No.  
11 Q. Have you spoken with Tom Harvey  
12 about your deposition?  
13 A. Yes, I just told you I spoke with  
14 him about it.  
15 Q. Have you spoken with any other Canal  
16 employee about your deposition?  
17 A. It is not worthy of talking about.  
18 Q. Do you know that Tiffany Chen was  
19 deposed in this matter?  
20 A. I do.  
21 Q. Have you communicated with her since  
22 her deposition?  
23 A. Well, she said she was deposed. You  
24 know, she can tell me that. That's it.  
25 Q. What did she say about her

1 A. Yes, I do.  
2 Q. Did you speak with him about his  
3 deposition?  
4 A. A little bit, but not much because  
5 you're not supposed to.  
6 Q. Well, when you say a little bit,  
7 what do you remember talking about?  
8 A. He said "I got deposed."  
9 Q. What else?  
10 A. That's it.  
11 Q. What did you say?  
12 A. I said, "Yes, well, okay. So let's  
13 move on and do the work we're supposed to be  
14 doing."  
15 Q. And that was the extent of the  
16 conversation? He said "I got deposed" and you  
17 said okay?  
18 A. There's not much to say. And he's  
19 not going to say it. He's told not to say  
20 anything, as I'm told not to say anything.  
21 It is not worth it. It is  
22 uncomfortable. This is all like, it is like it  
23 is all -- I feel like I want to take a shower  
24 after this whole thing.  
25 Q. Do you know that Michael Kaplan was

1     deposed in this matter?  
2     A. Yes, I heard that too.  
3     Q. Did you talk with him about it?  
4     A. No, I didn't.  
5     Q. Do you know that Sabrina  
6     Weeks-Britain was deposed in this matter?  
7     A. I heard she was.  
8     Q. Did you talk to her about it?  
9     A. No.  
10    Q. Do you know that Robin Chambers was  
11    deposed in this matter?  
12    A. I heard.  
13    Q. Did you talk with her about it?  
14    A. No.  
15    Q. Is that a "no"?  
16    A. Huh?  
17    Q. Is that a "no"? I'm sorry.  
18    A. Who?  
19    Q. Robin Chambers. Did you say no, you  
20    haven't spoken with her?  
21    A. I said no, yes.  
22    Q. Have you reviewed any documents in  
23    preparation for your deposition?  
24    A. Very few.  
25    Q. What documents do you recall

1     couple of days ago, and sitting here today a few  
2     days later, you have no idea what those  
3     documents were about?  
4     A. Believe it or not, I cannot recall  
5     specifically what those documents were about.  
6     They basically were about that she said this and  
7     you said that. Dah, dah, dah.  
8     You ask me questions in certain  
9     ways, I'll give you the answers.  
10    Q. Your counsel indicated that you had  
11    parenting obligations that affected the  
12    scheduling of the deposition.  
13    A. Yes.  
14    Q. What parenting obligations were  
15    they?  
16    A. They don't have to do with this  
17    deposition.  
18    MR. DROGIN: He's not going to  
19    answer that.  
20    MR. BENNETT: It relates to the  
21    same topic.  
22    To the extent you would like to  
23    contact Judge Parker's chambers, the  
24    defendant, Mr. De Niro, specifically,  
25    will seek relief under Rule 30(b)3.

1     reviewing?  
2     A. I can't remember.  
3     Q. When you say very few, how many  
4     documents were there?  
5     A. Three, four, if that.  
6     Q. And of the three or four, you have  
7     no idea what they were?  
8     A. I can't remember. I'll tell you, it  
9     is like so -- the whole thing is so absurd.  
10    Just ask me the questions and I'll give you the  
11    answers. Because whether I look at documents,  
12    I'm going to give you the same answer.  
13    Q. I know, but I get to ask questions  
14    and you get to give answers.  
15    A. You can do whatever you want.  
16    Q. Thank you.  
17    My question simply, sir, is do you  
18    remember anything at all about any of the  
19    documents --  
20    A. No, I don't.  
21    Q. -- that you reviewed?  
22    How long ago did you review the  
23    documents?  
24    A. A couple days ago.  
25    Q. So you reviewed a few documents a

1     If not, I suggest you move on to  
2     another topic. And you can seek that  
3     relief following the deposition after  
4     the party's counsel have had a chance to  
5     meet and confer.  
6     (Whereupon, the transcript  
7     was marked for a direction not to  
8     answer.)  
9     BY MR. SANFORD:  
10    Q. So, did you have parenting  
11    obligations that prevented you, sir, from  
12    spending a full day in your deposition?  
13    A. Yes, yes, I did.  
14    Q. Did you attempt to hire a  
15    baby-sitter or get any other help to assist with  
16    those obligations?  
17    A. I did what I had to do in order to  
18    get my kids treated the proper way, taken care  
19    of the proper way. The proper way has resulted  
20    in the way we're doing it today and tomorrow.  
21    Q. I'm sorry, you broke up a little bit  
22    there.  
23    You're saying you were trying to get  
24    treatment and do something in the proper way?  
25    MR. BENNETT: That wasn't his

1 testimony.  
 2 Bob, Bob, hold on.  
 3 A. As a parent --  
 4 MR. SANFORD: I can't hear  
 5 Mr. De Niro speak with the noise in the  
 6 background.  
 7 MR. BENNETT: Okay.  
 8 Can Catherine read back the  
 9 testimony, because I think that question  
 10 was answered?  
 11 MR. SANFORD: I don't want the  
 12 last question read back.  
 13 Thank you.  
 14 BY MR. SANFORD:  
 15 Q. My question is: You had childcare  
 16 obligations. Were you able to get a baby-sitter  
 17 to handle those obligations?  
 18 A. I need more than a baby-sitter, my  
 19 friend. And I need to do it in such a way to  
 20 take care of my kids properly. So this is the  
 21 way I could do it.  
 22 Q. Was there any other issue besides  
 23 what you have already testified about here today  
 24 that prevented you from starting today's  
 25 deposition at 1:00 p.m. Eastern?

1 Q. Well, we're trying to get as much  
 2 testimony in as possible here and trying to make  
 3 it efficient. I'm just wondering if you can  
 4 stay later than 2:30, if necessary.  
 5 MR. DROGIN: Okay, Counsel, the  
 6 witness will confer with counsel.  
 7 A. Yes.  
 8 MR. SANFORD: I understand that.  
 9 BY MR. SANFORD:  
 10 Q. Sitting here today, is there any  
 11 reason you know of that would prevent you from  
 12 staying later than 2:30?  
 13 MR. DROGIN: Hold on. Hold on.  
 14 THE WITNESS: He's speaking.  
 15 MR. DROGIN: Sorry. We're going  
 16 to object and we're going to direct the  
 17 witness not to answer.  
 18 You have been advised there is an  
 19 ongoing litigation. There is an ongoing  
 20 legal matter. Mr. De Niro is  
 21 represented by counsel. You are  
 22 deposing Mr. De Niro pursuant to a  
 23 notice where you yourself have agreed to  
 24 the times of the depositions.  
 25 If you want to talk about

1 MR. DROGIN: Objection. The  
 2 witness is not going to answer that  
 3 question.  
 4 Do not answer the question.  
 5 (Whereupon, the transcript  
 6 was marked for a direction not to  
 7 answer.)  
 8 MR. SANFORD: Are you directing  
 9 the witness not to answer that question?  
 10 MR. DROGIN: I am.  
 11 BY MR. SANFORD:  
 12 Q. Mr. De Niro, are you accepting your  
 13 counsel's recommendation?  
 14 A. I sure am. I sure am.  
 15 MR. DROGIN: And as before, we're  
 16 prepared to go to Magistrate Judge  
 17 Parker now for a ruling.  
 18 BY MR. SANFORD:  
 19 Q. Mr. De Niro, can you start  
 20 tomorrow's deposition later than 10:00 a.m.?  
 21 A. I have to finish at a certain point  
 22 because I have to get my kids.  
 23 Q. Can you end tomorrow's deposition  
 24 later than 2:30 p.m.?  
 25 A. Is there a problem with that?

1 modifying the times for the  
 2 deposition --  
 3 THE WITNESS: I'll give you less  
 4 time, if you would like.  
 5 MR. DROGIN: Let me finish.  
 6 MR. SANFORD: Mr. De Niro is  
 7 willing to be accommodating here, is  
 8 what I'm hearing.  
 9 BY MR. SANFORD:  
 10 Q. Mr. De Niro, are you willing to stay  
 11 later than 2:30 tomorrow?  
 12 MR. DROGIN: Mr. De Niro is not  
 13 going to answer that question because  
 14 Mr. De Niro has the right to confer with  
 15 counsel about the scheduling of his  
 16 deposition.  
 17 Counsel, you're not going to  
 18 negotiate with our client who's  
 19 represented by counsel. If you want to  
 20 direct a question to counsel on a break,  
 21 we'll go back to Mr. De Niro and confer  
 22 with him.  
 23 MR. SANFORD: Are you directing  
 24 him not to answer?  
 25 MR. DROGIN: I think we have been



1 very clear that we are.  
 2 (Whereupon, the transcript  
 3 was marked for a direction not to  
 4 answer.)  
 5 BY MR. SANFORD:  
 6 Q. All right.  
 7 Mr. De Niro, are you accepting your  
 8 counsel's recommendation?  
 9 A. Yes, I am.  
 10 Q. Mr. De Niro, have you ever had an  
 11 anger management problem?  
 12 MR. BENNETT: Objection.  
 13 A. No.  
 14 BY MR. SANFORD:  
 15 Q. Has anyone ever suggested that you  
 16 have an anger management problem?  
 17 A. No. It might appear that I have one  
 18 because of my hostility to you, but don't you  
 19 understand -- you could understand why I am so  
 20 hostile and so resentful of this treatment  
 21 because it is totally absurd that I was being  
 22 put through this for what I did for Chase  
 23 Robinson.  
 24 To be put through this by this -- I  
 25 don't want to say -- she's not -- I don't think

1 she's all there because this is crazy. Just so  
 2 you know that, this is crazy.  
 3 Q. Well, you called her a bitch before.  
 4 A. What's wrong with calling someone a  
 5 bitch? Though, I didn't call her a bitch. You  
 6 said I called her a bitch. She is -- I think  
 7 that, but I won't call her that, because she  
 8 knows what she did.  
 9 And I know I treated her very, very,  
 10 very, very well, but still she felt entitled,  
 11 like some people who feel entitled to do these  
 12 kinds of things. It just baffles my mind that  
 13 this person would do this.  
 14 Q. Well, Ms. Chen called her an  
 15 asshole. Do you think she is an asshole?  
 16 A. What's wrong with that? Oh, come  
 17 on. Don't ask me a stupid question like that.  
 18 When people are mad they say those  
 19 things. What's wrong with that? You haven't  
 20 called anybody you know an asshole? Give me a  
 21 break.  
 22 Q. Are you mad right now?  
 23 A. Yes, I am annoyed, yes. Because I  
 24 have real problems in my life, and what you  
 25 people are putting me through is ridiculous.

1 And you're doing your job, and maybe  
 2 you're hoping that you'll hit a home run by  
 3 getting me to do something or say something that  
 4 will then win something for her, but nothing  
 5 will be won for her.  
 6 I did everything right by her all  
 7 the time, all the time. And this is no good  
 8 deed goes unpunished. You know that one? Well,  
 9 that's what this is. Of course I'm upset.  
 10 Q. [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 MR. BENNETT: Objection.  
 14 BY MR. SANFORD:  
 15 Q. For what reason?  
 16 MR. BENNETT: Objection.  
 17 A. [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 BY MR. SANFORD:  
 21 Q. [REDACTED]  
 22 MR. DROGIN: Objection.  
 23 A. That's none of your business.  
 24 MR. DROGIN: Direct the witness  
 25 not to answer.

1 (Whereupon, the transcript  
 2 was marked for a direction not to  
 3 answer.)  
 4 MR. BENNETT: Objection.  
 5 MR. SANFORD: You're going to  
 6 direct the witness not to answer that  
 7 question.  
 8 BY MR. SANFORD:  
 9 Q. Mr. De Niro, are you going to accept  
 10 your counsel's recommendation?  
 11 A. Yes, I am.  
 12 Q. [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 MR. DROGIN: Objection.  
 16 Objection.  
 17 MR. BENNETT: Objection.  
 18 MR. DROGIN: Hold on. Hold on.  
 19 Objection to the question, and I direct  
 20 the witness not to answer.  
 21 Mr. De Niro has not put his  
 22 mental state at issue in this case.  
 23 (Whereupon, the transcript  
 24 was marked for a direction not to  
 25 answer.)

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1 A. You're creating my mental state and  
2 you know it. And you're trying to antagonize  
3 me, harass me, embarrass me.

4 So take your best shot, okay.  
5 That's what this is all about.

6 BY MR. SANFORD:

7 Q. [REDACTED]

10 Q. When was that?

11 A. [REDACTED].

12 Q. When was that?

13 A. [REDACTED]

16 Q. Any other times?

17 A. No.

18 Q. Has anyone ever told you that you  
19 were abusive?

20 MR. DROGIN: Objection to the  
21 form.

22 You can answer.

23 A. No.

24 BY MR. SANFORD:

25 Q. Has your anger created problems in

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1 your personal life?

2 MR. DROGIN: Objection to the  
3 form.

4 MR. BENNETT: Objection.

5 MR. DROGIN: You can answer.

6 A. Do I get angry? Of course. People  
7 get angry about things. And you have to, you  
8 know, manage that when you feel you don't want  
9 to get out of control.

10 And I might look to you like I get  
11 out of control, but I am very much in control  
12 many and most of the time, and -- but I'm  
13 entitled to be annoyed at this whole process.

14 With everything in my life that  
15 means something to me, I have to sit here and be  
16 humiliated -- not humiliated, not humiliated --  
17 with the attempt to humiliate and embarrass me  
18 and see what they can find.

19 What you can find, the senior  
20 lawyer. I'm sorry I am annoyed. It is a waste  
21 of time.

22 How old are you? Can I ask you  
23 that?

24 BY MR. SANFORD:

25 Q. Is the answer to my question "yes"?

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1 A. That's my answer.

2 And I'm asking you, how old are you?

3 Q. We don't have a conversation --

4 A. I think I'm older than you. You  
5 have a lot going on in your life, I'm sure. So  
6 do I. Going through this is a ridiculous joke.

7 Q. I ask questions and you give  
8 answers.

9 Has your anger created problems in  
10 your personal life? That was my question.

11 A. No.

12 MR. DROGIN: Objection to the  
13 form.

14 A. Believe it or not, no.

15 BY MR. SANFORD:

16 Q. Has your anger created problems in  
17 your professional life?

18 MR. BENNETT: Objection.

19 A. No.

20 BY MR. SANFORD:

21 Q. Have you drunk alcohol at any time  
22 in your life?

23 A. Sometimes.

24 Q. And when you would drink alcohol,  
25 would you get easily enraged?

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1 MR. DROGIN: Objection to the  
2 form.

3 A. No.

4 BY MR. SANFORD:

5 Q. Would you become argumentative?

6 MR. DROGIN: Objection to the  
7 form.

8 A. When and if the time I have a drink,  
9 I was a happy person.

10 BY MR. SANFORD:

11 Q. So you would drink and get happy?

12 A. In my experience.

13 Q. Were you more likely to raise your  
14 voice when you would drink?

15 MR. BENNETT: Objection.

16 A. I'm not going to answer that.

17 MR. DROGIN: Objection to the  
18 form.

19 BY MR. SANFORD:

20 Q. I'm sorry, I couldn't hear the  
21 answer.

22 A. I'm not going to answer that.

23 Q. Why not?

24 A. Because it is a silly question.

25 Q. What makes it silly?

17 (Pages 62 to 65)

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1 A. It is silly and you know it, and it  
2 has nothing to do with this case.

3 Q. Did you feel -- would you feel freer  
4 to curse when you would drink?

5 MR. BENNETT: Objection.

6 A. I feel like cursing right now, but  
7 I'm not going to, of course.

8 BY MR. SANFORD:

9 Q. You can curse if you would like.

10 A. No, I don't want to. I feel it is  
11 beneath me to curse, believe it or not.

12 Q. So do you feel freer to abuse people  
13 when you drink?

14 MR. BENNETT: Objection.

15 A. No, I don't. And this to me is --  
16 let's just -- just keep asking me questions.  
17 Let's move on, please.

18 BY MR. SANFORD:

19 Q. Has your drinking affected your  
20 memory?

21 MR. DROGIN: Objection to the  
22 form.

23 A. No.

24 BY MR. SANFORD:

25 Q. Have you ever blacked out from

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1 drinking?

2 MR. DROGIN: Objection to the  
3 form.

4 A. No.

5 BY MR. SANFORD:

6 Q. Was there ever a time when you  
7 passed out from drinking near the Greenwich  
8 Hotel where a bellhop found you on the street?

9 MR. DROGIN: Objection, and  
10 direct the witness not to answer any  
11 further questions about the use of  
12 alcohol. This has nothing to do with  
13 this case.

14 If you would like to mark it for  
15 a ruling, you can mark it for a ruling.  
16 If you want to take it to the judge  
17 right now, we can take it to the judge  
18 right now.

19 (Whereupon, the transcript  
20 was marked for a direction not to  
21 answer.)

22 MR. SANFORD: I can assure you  
23 we're marking for rulings a lot of  
24 what's happening here, Mr. Drogen.

25 MR. DROGIN: That's fine.

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1 MR. SANFORD: Are you directing  
2 the witness not to answer my question?

3 MR. DROGIN: Yes, and I suggest  
4 you move on to what this lawsuit is  
5 about. You have a client who's waiting.

6 MR. SANFORD: You understand  
7 these are improper directions not to  
8 answer, right?

9 You understand, you understand  
10 the rules of federal -- Federal Rules of  
11 Civil Procedure? You understand that  
12 there are only certain limited  
13 circumstances in which you get to direct  
14 the witness not to answer. You  
15 understand that, right?

16 MR. DROGIN: Are you questioning  
17 me?

18 MR. SANFORD: Yes. You're  
19 directing the witness not to answer, and  
20 I'm asking if you understand the rules.

21 MR. DROGIN: I understand that  
22 your law firm is currently in the  
23 process of responding to a Rule 11  
24 motion because of the two baseless  
25 claims that you have brought.

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1 I also understand that you are  
2 not permitted to ask questions that are  
3 intended to harass, intimidate or  
4 threaten the witness.

5 This case, this case -- you have  
6 been questioning the witness for almost  
7 an hour and you have yet to touch on the  
8 subject matter of this litigation.

9 BY MR. SANFORD:

10 Q. [REDACTED]

11 [REDACTED]  
12 MR. DROGIN: Objection, and  
13 direct the witness not to answer.

14 Why don't we just call the judge.  
15 Maybe you're right.

16 (Whereupon, the transcript  
17 was marked for a direction not to  
18 answer.)

19 MR. SANFORD: We're wasting a lot  
20 of time, Mr. Drogen. If you want to  
21 direct not to answer, please state it  
22 for the record and let's move on.

23 BY MR. SANFORD:

24 Q. Mr. De Niro, are you following your  
25 counsel's direction?

18 (Pages 66 to 69)

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1 A. Yes, I am.

2 MR. DROGIN: I don't understand  
3 why -- if you think I'm wrong, let's  
4 take it to the judge. And then, if  
5 you're right, he can answer it.

6 BY MR. SANFORD:

7 Q. Mr. De Niro, did anyone ever accuse  
8 you of being an alcoholic?

9 A. No.

10 Q. [REDACTED]

13 Q. When was that?

14 A. A couple years ago.

15 Q. By that, you mean what year?

16 A. I guess it was, oh, three years ago  
17 sometime. Whatever year that was. '19.

18 Q. [REDACTED]

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1 [REDACTED]

10 Q. And when you say they didn't allow  
11 you to have any -- sorry?

12 A. Yes, they might do other things, but  
13 that's what was for me for what I was doing.

14 Q. And when you say they didn't allow  
15 you [REDACTED]

[REDACTED]

25 Q. And when you say your son felt that

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1 [REDACTED] which son was that?

2 A. My oldest son, [REDACTED]

5 MR. DROGIN: Objection to the  
6 form.

7 A. I don't know that.

8 BY MR. SANFORD:

9 Q. You don't know?

10 A. No.

11 Q. [REDACTED]

14 MR. BENNETT: Objection.

15 A. I'm not sure.

16 BY MR. SANFORD:

17 Q. [REDACTED]

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1 MR. BENNETT: Objection.

2 Don't answer the question, Bob.

3 That's not something that has any  
4 remote connection to the controversy at  
5 issue in this action.

6 (Whereupon, the transcript  
7 was marked for a direction not to  
8 answer.)

9 BY MR. SANFORD:

10 Q. [REDACTED]

11 [REDACTED]

12 A. No.

13 Q. You didn't have a glass of wine with  
14 Chase Robinson in London at La Fromagerie?

15 A. Yes, I did with her that one time,  
16 yes.

17 Q. [REDACTED]

[REDACTED]

24 Q. And besides that instance, were  
25 there other instances when you had alcohol since

19 (Pages 70 to 73)

1 [REDACTED]  
2 A. [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 A. That was one time that I was being  
6 honored in a film festival in Africa, and I  
7 picked up the thing and she made a big thing out  
8 of it.  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 A. No.  
17 Q. -- [REDACTED]  
18 [REDACTED]  
19 A. No.  
20 Q. [REDACTED]  
21 [REDACTED]  
22 A. Yes.  
23 Q. All right.  
24 We're going to play a recording for  
25 you that has been Bates stamped ROBINSON 7147.

1 MR. SANFORD: Can we do that,  
2 please.  
3 (Whereupon, an audio  
4 recording was played.)  
5 MR. SANFORD: For the record, we  
6 began playing the recording at the time  
7 stamp of 118, and we're marking the  
8 document as Plaintiff's Exhibit 110.  
9 (Recording was marked as  
10 Plaintiff's Exhibit 110 for  
11 identification, as of this date.)  
12 BY MR. SANFORD:  
13 Q. Mr. De Niro, do you recognize your  
14 voice on that recording?  
15 A. Yes, I do.  
16 Q. Would you consider yourself hostile  
17 on the recording?  
18 A. I was angry, yes, I was angry.  
19 Q. Why did you say what you said in  
20 that voice-mail?  
21 A. Because that's what she did. I was  
22 accommodating her. She's living in Spain. She  
23 lives in London. She works from there. She  
24 does this and that. Then I hear later that  
25 she's using Ubers and staying in hotels, my

1 expense. Air miles.  
2 I mean, this is later I hear this,  
3 but then she knew I had to be woken up and it  
4 was her responsibility. I never get mad like  
5 that with her, with her.  
6 But I've got to say, I was so  
7 resentful and angry at what she had done. She  
8 couldn't even -- it was an important meeting and  
9 she just blew it off. I don't know what she  
10 did. Maybe she forgot about it.  
11 Whatever the reason, with all her  
12 things, and she is such a great worker and all  
13 this. Now I hear that a lot of things she gave  
14 to other people to do. She wasn't even doing  
15 it.  
16 I don't know what kind of delusion  
17 this woman is in or has about how she worked and  
18 how hard she worked. She was hated by  
19 everybody. I didn't know that. Nobody told me.  
20 They had a celebration after she left, which I  
21 didn't go to.  
22 But this is the kind of -- I'm  
23 trusting her to do the right thing. I say go to  
24 Spain if that's going to be easier for you. Go  
25 to Spain and you can do work from there, go

1 here.  
2 I knew she would keep that thing and  
3 use it today and I would be sitting in the  
4 situation I am right now hearing that. I knew  
5 that, but I was so angry.  
6 I said listen, fuck it. I'm going  
7 to say this. You were wrong. You know, you  
8 claim that you work so hard. You do all this,  
9 you do all that. I started questioning whether  
10 she really did do as much as she said she did.  
11 Q. You approved her work from Spain,  
12 didn't you?  
13 A. Well, I -- listen, I wanted to make  
14 her happy. I figured if she wants to go there,  
15 she has a reason. If she can do it with the  
16 internet and so on, I'm okay with that.  
17 I'm not the kind of boss, if you  
18 will, that says you have to stay here 9 to 5,  
19 all that stuff. I believe in letting people do  
20 what they want to do as long as they do their  
21 job.  
22 And if they don't do their job,  
23 then, look what happens. I mean, I was -- even  
24 then I forgive them.  
25 I said, "Just don't do it again.

1 Thank you for copping to not doing what you  
2 should not have done." That's all. That's all  
3 I ask. Be honest about what you did wrong. You  
4 screwed up. Fine, say it, and then we move on.  
5 People make mistakes.

6 And that's how, that's how you  
7 create loyalty with people. By understanding  
8 that it is okay if you make a mistake.

9 But what I don't like is what this  
10 woman is doing to me right now. She tried to  
11 shake me down for \$600,000. She wrote a fake  
12 letter to the London School of Economics which  
13 couldn't have been used for any kind of job, and  
14 I knew that and I was not going to sign it.

15 I do the right thing by my  
16 employees. You have spoken to other ones. I  
17 don't -- the most I ever get is annoyed by  
18 something. I don't abuse them. I don't do  
19 anything. I don't curse at them. I don't do  
20 anything.

21 MR. DROGIN: Can we move on with  
22 the questions?

23 A. I have my trainer. Dan Harvey is  
24 with me almost 40 years. I have other people  
25 working with me for long periods of time.

1 here to answer questions. Let's move  
2 on. You can Google him and read all  
3 about him.

4 Go ahead.

5 BY MR. SANFORD:

6 Q. Mr. De Niro, you yelled at  
7 Ms. Robinson a number of times throughout her  
8 employment, didn't you?

9 A. What?

10 Q. You yelled at Ms. Robinson a number  
11 of times throughout her employment?

12 A. No, I didn't yell at her a number of  
13 times.

14 Q. This was the only time you ever did?

15 A. I could have gotten upset, but I  
16 didn't yell at her a number of times. That's  
17 wrong. I did not do that.

18 Q. Did you, did you apologize to  
19 Ms. Robinson for having left that voice-mail  
20 message?

21 A. I could have because I know that  
22 even though I was entitled to leave that  
23 message, I apologized to her for just being so  
24 upset. I could very well have done that. Did  
25 she record that too?

1 You have to really do something  
2 egregious to say, well, you know, I guess you  
3 shouldn't be here.

4 MR. DROGIN: Can we just move on  
5 with the questioning, please?

6 BY MR. SANFORD:

7 Q. Are you finished, Mr. De Niro?

8 A. I'm finished.

9 Q. Are you ashamed of yourself for  
10 having left the voice-mail message you did?

11 MR. DROGIN: Objection.

12 A. No, I'm not ashamed. No, I'm not  
13 ashamed. People get mad. They say things. I  
14 wasn't abusive. I was yelling, yes, but I was  
15 yelling at what she had not done.

16 I was not calling her names or this  
17 or that or being abusive in a way which is not  
18 acceptable. I was mad about the situation.

19 And it was important to me, so, yes,  
20 I was mad. You never got mad at anybody in your  
21 office? Huh? Sir, come on.

22 MR. DROGIN: He's not here to  
23 answer questions.

24 A. He's not answering questions.

25 MR. DROGIN: Hold on. He's not

1 Q. Well, I'm not asking if you could  
2 have. I'm asking if you remember having done  
3 so.

4 A. No, I don't remember. But knowing  
5 myself, I could have.

6 Q. Had you been drinking prior to  
7 leaving Ms. Robinson that voice-mail message?

8 MR. BENNETT: Objection.

9 A. I don't remember. I don't remember.

10 BY MR. SANFORD:

11 Q. You might have been; you just don't  
12 know?

13 A. I don't know.

14 Q. Were you more likely to yell at  
15 Ms. Robinson when you had been drinking alcohol?

16 MR. BENNETT: Objection.

17 MR. DROGIN: Objection to the  
18 form.

19 A. No.

20 BY MR. SANFORD:

21 Q. You can answer.

22 A. No, no. It was -- she had done  
23 something that was just -- anyway, you know what  
24 it is. I just was very upset by it.

25 Q. Were you more likely to curse at



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1 Ms. Robinson when you had been drinking alcohol?

2 MR. BENNETT: Objection.

3 MR. DROGIN: Objection to the  
4 form.

5 A. I'm not answering that.

6 MR. DROGIN: You can answer.

7 THE WITNESS: I'm not answering  
8 him.

9 A. I don't curse anymore at her if I  
10 had been drinking. I just didn't -- you know, I  
11 was mad at her. I might have acted the same way  
12 if I was drinking. I don't know.

13 That was my reaction to her at that  
14 time. I was tired. I had been traveling. I  
15 came from back East. It was a three-hour  
16 difference. I was on a later time schedule.

17 BY MR. SANFORD:

18 Q. [REDACTED]

19 A. No.

20 MR. BENNETT: Objection.

21 A. [REDACTED]

22 BY MR. SANFORD:

23 Q. When did you first meet  
24 Ms. Robinson?  
25

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1 A. I don't know. By now it is 13 years  
2 ago, maybe longer.

3 Q. Did you interview Ms. Robinson  
4 before she joined Canal?

5 A. Yes.

6 Q. What were your first impressions of  
7 her?

8 A. She seemed okay. And as I say to  
9 any new perspective employee that really -- I  
10 can describe certain things of what the job is.  
11 I get a sense of the person.

12 But the real -- the people who give  
13 the real day-to-day sense of what the operation  
14 would be, what their job would be, would be  
15 people like Chase and the other people in the  
16 office.

17 I said talk to them. They'll tell  
18 you what it really is and then you decide if you  
19 want to do it. That's the job. That will be  
20 pretty much what the job will be.

21 Q. Did you offer Ms. Robinson a  
22 position?

23 A. She was applying for the position of  
24 my head -- my point person, if you will.

25 Q. Did you offer her that position?

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1 A. Huh?

2 Q. Did you offer her that position?

3 A. That was what she was applying for.  
4 If she was applying for it, then that's what I  
5 was offering her.

6 Q. What were the qualities you valued  
7 in Ms. Robinson as an employee?

8 MR. BENNETT: Objection.

9 MR. DROGIN: Objection to the  
10 form.

11 A. Well --

12 MR. DROGIN: You can answer.

13 A. She was fine. You can't really  
14 tell. People say I work so hard. I did this or  
15 that. Then you start hearing that she delegated  
16 stuff to other people in the office on the  
17 seventh floor in TriBeCa.

18 So she didn't really quite do so  
19 much. She would say she is doing certain  
20 things. I didn't know. I trusted her. I said,  
21 listen, what you say is what I believe. I don't  
22 want to be around a person who lies to me. Just  
23 say what you do and what you can't do, and we'll  
24 figure a way to do it if you can't do it. Then  
25 we'll figure to get someone else to do it. Just

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1 say what it is.

2 But I saw that she wanted to control  
3 everything. And what -- that's a problem when  
4 people want to control everything. They don't  
5 realize that you just have to use the best of  
6 what the people have. Respect them and you will  
7 get a lot further.

8 She had ideas about wanting to be an  
9 executive and this and that, wanting me to give  
10 her all kinds of titles. I said the only thing  
11 you need from me -- you don't need those titles.  
12 They mean nothing. All you need is a letter of  
13 recommendation from me, and that's it.

14 And I didn't even say do your job.  
15 What I was thinking is just do your job. Do the  
16 right thing. Be honest. Be straightforward.  
17 You'll always come out ahead.

18 That's all I ask. It is the honor  
19 system. You do the right thing, you get repaid  
20 accordingly. It is that simple.

21 BY MR. SANFORD:

22 Q. Do you remember my question?

23 A. You can repeat it if you want.

24 Q. Do you remember it?

25 MR. DROGIN: Note the objection

22 (Pages 82 to 85)

1 to the form of the question.  
 2 BY MR. SANFORD:  
 3 Q. Do you remember my question?  
 4 A. I don't remember. Why don't you  
 5 just repeat it and I'll answer in a better way.  
 6 Q. I'm happy to do it.  
 7 What were the qualities you valued  
 8 in Ms. Robinson as an employee?  
 9 A. You know, I'm not sure. In the  
 10 beginning, she -- there were things about her  
 11 that were kind of arrogant, a little petulant.  
 12 As years went on, she felt more entitled to act  
 13 that way.  
 14 I defended her with somebody who was  
 15 working with us; my wife, who I am currently  
 16 divorcing; with a guy who's running the  
 17 household thing and I felt he was being too much  
 18 of a bully with her.  
 19 And I -- and I told him -- I told my  
 20 wife and him to back off from her. I felt she  
 21 was being bullied and I didn't like it. And  
 22 that's it.  
 23 So all I want is people to get  
 24 along, do the right thing, do their job and, you  
 25 know, do it to the best of your ability. If

1 Q. I asked you what qualities you  
 2 valued in Ms. Robinson. You talked about  
 3 arrogance and petulance and bullying.  
 4 I'm wondering if those are the  
 5 qualities that you, in fact, valued?  
 6 A. No, I didn't, no, I didn't. I  
 7 didn't value -- you mean -- I'm not  
 8 understanding. You're saying I valued?  
 9 Q. Valued. Do you know what it means  
 10 to value a quality?  
 11 A. No, I didn't value those qualities  
 12 if she had them. And I saw them later on. I  
 13 tolerated them.  
 14 Q. Okay.  
 15 So what qualities did you value of  
 16 Ms. Robinson?  
 17 A. I thought she was a good worker.  
 18 She kept saying she was a good worker. She kept  
 19 doing that. When I called her and asked her to  
 20 do something, she had it done. She knew she had  
 21 to have it done. That was all fine.  
 22 As time went on, she would get --  
 23 you know, she would take liberties with doing  
 24 this or choosing something. You don't need  
 25 that. I'll take this.

1 there's a complaint or something and you come  
 2 tell me, I'll try and fix it, hopefully. That's  
 3 all I can do.  
 4 Q. Do you remember the question I  
 5 asked?  
 6 A. No, tell me again.  
 7 Q. I asked --  
 8 A. Or whether she has good qualities.  
 9 I just told you. That's how I can answer that  
 10 question.  
 11 Q. Well, I asked you if there were  
 12 qualities you valued. You talked about  
 13 arrogance and petulance.  
 14 A. Yes --  
 15 Q. May I finish?  
 16 A. -- but I can't, you know --  
 17 Q. Mr. De Niro, in order to have a  
 18 clean record --  
 19 A. Yes.  
 20 Q. I know it is difficult on the  
 21 screen, so I'm not criticizing you. I'm just  
 22 saying that it is going to be important for us  
 23 not to talk over one another. Let me just  
 24 finish my question.  
 25 A. Okay.

1 And I would say that's a little -- I  
 2 don't know, it is a little forward, but I'll let  
 3 it go because, you know, people get their  
 4 little -- they get a little eccentric, a little  
 5 crazy.  
 6 You have to tolerate people's  
 7 foibles. That's okay. That's life. You can't  
 8 get rid of them for that. You know, that's  
 9 okay. They have good qualities that outweigh  
 10 those qualities. I'll tolerate those.  
 11 Q. What are the qualities --  
 12 A. She led me to believe she was doing  
 13 everything that I asked her to do. A lot of  
 14 times she hired good people. She interviewed  
 15 them and then we would get them. They were the  
 16 people I have now. Sabrina especially is  
 17 terrific.  
 18 So Chase did that. She does good  
 19 things. I was not, I -- in fact, I was so busy  
 20 that I wasn't, you know -- just do what it is  
 21 and no problem. Let's move on.  
 22 There's no -- I wasn't asking her to  
 23 do things that were hard or so hard. And she  
 24 ran the office. She was the point person. I  
 25 need this, so she'll delegate to whomever it



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1 would be.

2 And I would say, you know, fine. I  
3 just want to get it done.

4 I don't know if I'm answering your  
5 question.

6 So she led me to believe that she  
7 had good qualities. But as time went on and now  
8 in this, this situation, I realize she didn't.

9 And she had nefarious, devious  
10 qualities. She would take my calls. She cloned  
11 my phone. She used my air miles. She took Uber  
12 in Europe when she shouldn't have. I never gave  
13 her permission. She did things in LA where she  
14 shouldn't have. She spent money.

15 I don't know whether she just felt  
16 she was entitled. I don't know what that is.  
17 That is not good. That's stealing. She stole  
18 from me. That, I don't accept.

19 You can tell me, look, she said "I  
20 want to take some air miles. Can I do that?"

21 And I said "Sure. Don't take too  
22 many."

23 I just want to make sure my kids can  
24 use them if they need them. Because one of my  
25 kids was complaining about the air miles. I

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1 said no, no, they need them first. I rather pay  
2 for her. Then let the kids -- whatever is the  
3 best. But I didn't want all the air miles to be  
4 used by her, and I didn't even know how many air  
5 miles I had.

6 But I trusted her to allot to  
7 herself the amount of air miles she would need  
8 for her work.

9 Q. We're going to talk about that.  
10 We're going to talk about air miles. Let me ask  
11 you this.

12 You say that she was your point  
13 person. What does it mean to be your point  
14 person?

15 A. Do you have a head person in your  
16 office --

17 Q. My question --

18 A. -- who does everything?

19 Listen, okay. A point person is  
20 your main person with you who does -- maybe it  
21 is the lead assistant or -- she is my head  
22 assistant.

23 She is the person that delegates all  
24 the things to be done in the office and does  
25 out, if you will, the assignments for certain

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1 things so I don't have to go to each person and  
2 say you do this, you do that.

3 That is what that was. She had a  
4 lot of control.

5 Q. So she controlled delegating  
6 assignments and she was that point person  
7 throughout the time she had worked for you?

8 A. Yes, pretty much, yes.

9 Q. All right.

10 During her employment -- during  
11 Ms. Robinson's employment at Canal, how many  
12 times would you communicate with her during an  
13 average day?

14 MR. DROGIN: Objection to form.

15 A. A few times.

16 THE WITNESS: Sorry.

17 MR. DROGIN: Objection to the  
18 form.

19 You can answer.

20 BY MR. SANFORD:

21 Q. You can answer.

22 A. I would be talking to her a lot  
23 during the day. How is this? How is that? She  
24 would call me, e-mail. This is being done, dah,  
25 dah, dah. You know, it was just the usual

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1 stuff.

2 Q. How frequently would you text  
3 Ms. Robinson during an average day?

4 A. I don't remember. You know, I don't  
5 remember.

6 Q. How often would you meet with  
7 Ms. Robinson in a typical day?

8 A. It could be once a day. Sometimes  
9 not for a day or two or three if I'm busy doing  
10 something other than just being out of town.

11 Q. During Ms. Robinson's employment at  
12 Canal, Ms. Robinson generally kept you apprised  
13 of where she was throughout the course of a day,  
14 didn't she?

15 MR. BENNETT: Objection.

16 A. I think she probably did, but I'm  
17 not a hundred percent sure. Sometimes she  
18 didn't. But I would just rely on her. I would  
19 call her or say call me and that would be that.  
20 BY MR. SANFORD:

21 Q. It was common for you and  
22 Ms. Robinson to speak early in the morning  
23 before 9:00 a.m., right?

24 A. I think yes --

25 MR. BENNETT: Objection.

24 (Pages 90 to 93)

1 A. I think in the beginning of the day,  
 2 yes.  
 3 BY MR. SANFORD:  
 4 Q. And it was common for Ms. Robinson  
 5 to do work for you early in the morning as well,  
 6 right?  
 7 MR. BENNETT: Objection.  
 8 A. At times.  
 9 BY MR. SANFORD:  
 10 Q. And it was common for you and  
 11 Ms. Robinson to speak late at night until 8:00  
 12 o'clock or later, right?  
 13 MR. BENNETT: Objection.  
 14 A. It could be.  
 15 THE WITNESS: I'm sorry, should I  
 16 not answer? Or are you saying  
 17 objection?  
 18 MR. BENNETT: It's okay, Bob, go  
 19 ahead. I'll be very clear if I don't  
 20 want you to answer.  
 21 BY MR. SANFORD:  
 22 Q. And it was common for you and  
 23 Ms. Robinson or Ms. Robinson to speak with you  
 24 and do work on the weekends, right?  
 25 MR. BENNETT: Objection.

1 MR. BENNETT: Objection.  
 2 MR. DROGIN: Objection to the  
 3 form.  
 4 You can answer.  
 5 A. Well, she had to tell me that she is  
 6 going out. You know, that would be -- of course  
 7 she would have to tell me.  
 8 BY MR. SANFORD:  
 9 Q. And even if Ms. Robinson was  
 10 traveling away from New York, Ms. Robinson was  
 11 still available to work for you, right?  
 12 MR. BENNETT: Objection.  
 13 MR. DROGIN: Objection to the  
 14 form.  
 15 You can answer.  
 16 BY MR. SANFORD:  
 17 Q. I couldn't hear.  
 18 A. That was the understanding. That is  
 19 the absolute understanding. Not when she's  
 20 traveling. Maybe even then, you know, if she  
 21 had WiFi on the plane or something and I need to  
 22 get her a message before she landed say  
 23 wherever, in London, or whatever, if there was  
 24 WiFi on an international flight. Rarely that  
 25 would happen. You know, whatever.

1 A. Yes, if need be, yes.  
 2 BY MR. SANFORD:  
 3 Q. And it was common for you and  
 4 Ms. Robinson to speak on holidays, right?  
 5 MR. BENNETT: Objection.  
 6 A. If need be, yes.  
 7 BY MR. SANFORD:  
 8 Q. And during Ms. Robinson's employment  
 9 at Canal, Ms. Robinson kept you apprised if she  
 10 was going to be away from New York, right?  
 11 MR. BENNETT: Objection.  
 12 A. Yes, she said she would like to go  
 13 to Spain or London and do this, and I -- you  
 14 know, with the internet and technology these  
 15 days, I said okay. Even phones, okay.  
 16 That's -- I want to accommodate her. I want to  
 17 make her happy. I just -- that's how I am.  
 18 If people want to do something, they  
 19 need to do it that way. I'll say okay. I'm  
 20 okay with that as long as you do what you need  
 21 to have done.  
 22 BY MR. SANFORD:  
 23 Q. Ms. Robinson checked with you before  
 24 traveling from New York, going outside of New  
 25 York, right?

1 Q. And you would get upset if  
 2 Ms. Robinson was not available when you called  
 3 her, wouldn't you?  
 4 A. No, I wouldn't get upset. Only if  
 5 she was supposed to be available.  
 6 This wasn't a regular occurrence.  
 7 What happened on that recording was not a  
 8 regular occurrence. She did get back to me.  
 9 She knew that she had to, that I needed to do  
 10 something. So, you know, there was no, you  
 11 know --  
 12 Q. Can you describe for me the types of  
 13 things that Ms. Robinson did to assist you and  
 14 your family while she was employed at Canal?  
 15 MR. DROGIN: Objection to the  
 16 form.  
 17 You can answer.  
 18 A. Well, she would help me get  
 19 presents. We would go to stores, pick out this  
 20 with a list; this for this child, this for that,  
 21 this relative. You know, everything, just to  
 22 try and cover all that. She would go with me  
 23 and we would do all that.  
 24 You know, that stuff she would do  
 25 and stuff with the family. I need this or that.

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1 Yes, she is a personal assistant. She also was  
2 very important as far as helping me with those  
3 things.

4 BY MR. SANFORD:

5 Q. So besides getting presents and  
6 going to stores, what else would she do?

7 A. Well, you know, whatever,  
8 whatever -- she helped me with the house. She  
9 pulled in a friend of hers. I said fine, an  
10 interior designer.

11 We would go to the design center or  
12 here and there, look for furniture. Order  
13 furniture to certain specifications. She helped  
14 me with this, a piece of furniture. Be there  
15 waiting when it would come in, or somebody --  
16 she would have Michael there waiting for when it  
17 would come in.

18 You know, it was anything. Anything  
19 and everything.

20 Q. Okay.

21 Ms. Robinson's titles changed at  
22 various times during her employment at Canal,  
23 didn't they?

24 A. At her request.

25 MR. SANFORD: We are sharing a

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1 document with you in the chat that is  
2 Bates CANAL 45910, which is a July 18,  
3 2017 e-mail from Ms. Robinson to you.  
4 And we're marking the document as  
5 Plaintiff's Exhibit 113.

6 (Document bearing Bates  
7 stamp Nos. CANAL 45910 was marked as  
8 Plaintiff's Exhibit 113 for  
9 identification, as of this date.)

10 MR. BENNETT: Bob, are you able  
11 to see the chat?

12 THE WITNESS: I'm not seeing it.

13 MR. BENNETT: Put your mouse  
14 towards the bottom.

15 THE WITNESS: Yes. Press that?

16 MR. BENNETT: See where it says  
17 chat?

18 THE WITNESS: Okay.

19 So it is on the right?

20 MR. BENNETT: Down in the middle  
21 in the center.

22 THE WITNESS: I don't see  
23 anything. It says click the download.  
24 Should I do that?

25 MR. BENNETT: Yes, go right

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1 ahead.

2 THE WITNESS: Do it?

3 MR. BENNETT: Yes.

4 THE WITNESS: Click to open.

5 All right.

6 A. So, yes, I read this. What are you  
7 wanting to ask me?

8 MR. BENNETT: Bob, make sure you  
9 read through it.

10 BY MR. SANFORD:

11 Q. Do you see the document in front of  
12 you?

13 A. I see it. I read it.

14 Q. Okay.

15 And do you recognize the document?

16 A. I don't recognize it, but it sounds  
17 like -- it looks like one she sent. You know,  
18 vaguely familiar possibly.

19 Q. And what -- can you describe what  
20 that document is in front of you?

21 A. I don't know. What is she asking  
22 for a raise?

23 Q. Well, it is an e-mail from Chase  
24 Robinson to you, correct?

25 A. Yes.

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1 Q. And it is dated July 18, 2017,  
2 correct?

3 A. Right.

4 Q. Okay.

5 And it seems to reflect that you and  
6 Ms. Robinson had a conversation about giving  
7 Ms. Robinson a raise and additional expenses,  
8 correct?

9 A. Yes, this is -- she is appealing to  
10 me for that.

11 Q. Okay.

12 And do you remember having a  
13 discussion with Ms. Robinson in July of 2017  
14 concerning her pay and expenses?

15 A. I don't. But if you want to remind  
16 me what it is, I'll tell you how accurate it is.

17 Q. As of 2017, can you describe the  
18 various types of expenses Ms. Robinson was  
19 entitled to charge to Canal?

20 MR. BENNETT: Objection.

21 MR. DROGIN: Objection to the  
22 form.

23 A. I don't know what charge -- say that  
24 again.  
25

26 (Pages 98 to 101)

1 BY MR. SANFORD:

2 Q. Can you describe the types of  
3 expenses that Ms. Robinson was entitled to  
4 charge to Canal in around 2017?

5 A. Well, for petty cash. Stuff like  
6 that. I'm not, you know -- petty cash. She's  
7 in charge of taking -- paying certain bills.

8 I'm not, I'm not understanding  
9 really what your question is.

10 Q. Well --

11 A. Hello?

12 Q. I'm trying to think of a way to ask  
13 you as simply as I can.

14 A. You're trying to think of a way to  
15 ask me where I can incriminate myself in some  
16 way where I say something that I --

17 Q. Mr. De Niro, I can assure you, I'm  
18 not trying to trick you. I'm just trying to get  
19 information.

20 A. Okay. Okay. Okay. Good.

21 Q. I'm trying to ask you simple  
22 questions.

23 A. Go ahead, I'm listening.

24 I don't understand the intent of the  
25 letter other than that when it comes down to

1 it -- I have to look at reality for me and how I  
2 accomplish a balance, the past two years have  
3 been difficult, the raise and expenses to help  
4 me.

5 Again, she is asking for a raise.

6 Again, I stress, it is for the next two years  
7 and then we can discuss what's best for you and  
8 how I can help or how things can change. I  
9 completely understand where you're coming from.  
10 She says nice things.

11 So what is the upshot? A

12 conversation after this which I don't remember  
13 unless you remind me.

14 Q. There are certain expenses that  
15 Ms. Robinson incurred that she was entitled to  
16 seek reimbursement for from Canal, right?

17 MR. BENNETT: Objection.

18 A. Well, but she doesn't specify them  
19 here.

20 BY MR. SANFORD:

21 Q. Well, I'm asking what are those kind  
22 of expenses?

23 A. I don't know what they would be. If  
24 she laid out money on her own, she's entitled to  
25 be reimbursed.

1 If she spends money on even buying  
2 me sandwiches at a place near where she lives  
3 and where my daughter's school is that she  
4 introduced me to, then she gives me that and she  
5 pulls that out of petty cash.

6 You know, I trust her to do that. I  
7 trust her to pull the amount out if it is 15 or  
8 20 or \$25, not 50 or 100 or \$150. Not that I'm  
9 saying she does that.

10 But according to other things, it  
11 seems that she might have been prone to doing  
12 that kind of thing, though I'm not saying that.  
13 But there's something not quite kosher here.

14 In any case, I don't know what we're  
15 referring to here. If she says this is what I  
16 did, this is what I did, I'll say yes or no to  
17 those, to whatever she says.

18 Q. Do you know whether the expenses  
19 that Ms. Robinson was authorized to charge to  
20 Canal changed over time?

21 A. That's a general question I don't  
22 understand.

23 Changed over time to buy furniture  
24 for the townhouse, yes. To get this, to do  
25 that, to hire Rachel, to get Berdon to pay for

1 her -- whatever her reimbursements or whatever,  
2 that kind of stuff.

3 Things always change and shift if  
4 that's what you're asking.

5 Q. Well, there were expenses that  
6 Ms. Robinson was authorized to charge to Canal  
7 that were different from other executive  
8 assistants, right?

9 MR. BENNETT: Objection.

10 A. Like, for example? Please, if you  
11 can tell me.

12 BY MR. SANFORD:

13 Q. I'm asking you if you recall.

14 A. I don't know. I can't tell unless  
15 you tell me and I'll say it is true or not true.

16 Q. Did you ever discuss giving  
17 Ms. Robinson a raise?

18 A. I discussed giving her a raise, yes,  
19 and I thought it was -- she -- I remember where  
20 we were. We were right [REDACTED]

21 [REDACTED]  
22 [REDACTED]  
23 And she said -- it was November or  
24 something, I think, or late November or  
25 December.

1 And I said, listen, this probably --  
2 she said she is going to leave. I don't know --  
3 she said she had an offer or what -- I don't  
4 know. She had to leave.

5 And then I said "Well, this is  
6 really a bad time". I said, "Is there any way  
7 you can stay past the holidays? I'm moving into  
8 this new house. I'm going through a divorce.  
9 It would help a lot if you could stay past this  
10 time until I get over this hump."

11 And she said, "Yes, well, I'll need  
12 \$60,000."

13 So I said "Okay". So that's what I  
14 remember. It might have been more, but it was  
15 at least 60,000.

16 Q. And do you remember what she was  
17 making at the time in 2017 when you had this  
18 conversation?

19 A. It was a lot.

20 MR. BENNETT: Objection.

21 BY MR. SANFORD:

22 Q. It was a lot. And by "a lot," you  
23 mean how much?

24 A. I think it was 200,000. Close to  
25 it.

1 Q. Do you remember discussing expenses  
2 with her in that conversation?

3 A. I could have discussed expenses, but  
4 I don't know what you mean. I don't know what  
5 you mean.

6 Q. Well, do you remember talking to  
7 Ms. Robinson about expenses such as Ubers and  
8 taxis?

9 MR. BENNETT: Objection.

10 A. No, I don't remember talking about  
11 that.

12 BY MR. SANFORD:

13 Q. Do you remember talking with  
14 Ms. Robinson about working meals and expensing  
15 costs associated with working meals?

16 A. No, I don't remember that. If you  
17 get specific, maybe I can. But I don't remember  
18 that.

19 I mean, in general you talk about  
20 meals for the office, for the people working  
21 there. You know, stuff like that. I don't  
22 remember the focus at that meeting.

23 Q. You had many meetings with  
24 Ms. Robinson throughout the latter half of  
25 2017 --

1 A. Yes.

2 Q. -- continuing into 2018 concerning  
3 her title and compensation, didn't you?

4 A. Yes, she was always worried about  
5 her title and her compensation.

6 We went -- as I just said, we went  
7 into a higher pay, to a pay raise because I  
8 needed -- this was not the time for her to be  
9 leaving.

10 At the end of the day, if she had to  
11 leave, she had to leave. I was not going to  
12 stop her, but I was saying, "Could you stay  
13 longer?"

14 And she said, "Well, I'll need this  
15 and that and the money naturally."

16 So I said "Okay". I thought to  
17 myself it is worth it to me to do this. I  
18 always worried about spending and how much and  
19 this and that, but I said I have to --  
20 considering the circumstances, I think I have to  
21 bite the bullet and go and do this.

22 Q. So can you tell me everything you  
23 remember about those conversations in --

24 A. No, the -- I don't remember much. I  
25 only remember her asking me about the title and

1 saying how about -- she kept coming back with  
2 different titles and that was head of finance.

3 So I said okay. I mean, I was so  
4 tired of her asking for this and I thought to  
5 myself, well, this is what people do and certain  
6 people want. They want some raise in their  
7 stature in the company. So the company will  
8 give them a title. That way they don't have to  
9 give them as much money.

10 In my case, I gave her money and the  
11 title, but the title meant nothing. I said at  
12 the end of the day, it is just what you do for  
13 me, what you do, what you do for the company  
14 is -- and do it honorably, there's nothing, you  
15 know -- I would give you the highest  
16 recommendation.

17 And if you had to go to another  
18 company because you got a better offer, more  
19 power to you. I would never stop anybody. I  
20 would encourage people, especially if they're  
21 younger.

22 They might -- the job -- what is  
23 good for them is for a while, but they want to  
24 move on. So, fine, I want to help you. I'm not  
25 going to stop you.



1 The only thing you have to do is you  
2 have to be honorable. Do the right thing. Be  
3 honest and there's no problem.

4 Q. You met with Ms. Robinson on  
5 November 9, 2018 when Ms. Robinson informed you  
6 that she would be resigning.

7 Do you remember that?

8 A. Yes, well, I think that's the time  
9 when I met her, like I said, near my daughter's  
10 school.

11 Q. And tell me, tell me, if you would,  
12 everything you remember about that meeting.

13 A. I can't remember much. The only  
14 things I do remember, as I said, is the title  
15 thing and the money sitting there and, you know,  
16 and agreeing to that, because I was relieved  
17 that I didn't have to worry about her now for  
18 these next few months and that I could -- you  
19 know, we could get things done the way I was  
20 trying to get them done, you know, to get over  
21 this hump.

22 Q. You did not want Ms. Robinson to  
23 resign; isn't that fair to say?

24 A. I did not, I did not, not want  
25 her -- as I say, if she wanted to resign, she

1 had the right to resign.

2 I wouldn't threaten her, if that's  
3 what you're trying to imply. I just don't do  
4 that. I would say, you know, let's try -- can  
5 we try to work this out.

6 I don't even know if I would say  
7 that. She knew she wanted more money. That's a  
8 thing for her. Got it. She wanted a title.  
9 Got it. So I said I'll help you. Okay. I'll  
10 pay the money. We'll do this.

11 I need -- I didn't want to let her  
12 go. But if I had to let her go -- listen,  
13 life -- everybody is dispensable, including  
14 myself. So that's, you know -- you just got to  
15 learn to let go at a certain point. And you let  
16 go and you move on and things are fine.

17 Q. Why do you think you're dispensable?

18 A. We're all dispensable. We don't  
19 want to get into philosophy about life. But,  
20 you know, if I'm up for a movie and I'm doing a  
21 movie and all of the sudden something, God  
22 forbid, happens to me, they'll find somebody  
23 else.

24 Q. There's no one else quite like you;  
25 wouldn't you thing that's fair to say?

1 A. Yes, but they'll find somebody else  
2 if they want to make the movie, if the project  
3 is bigger than the -- the sum of the parts is  
4 bigger than the one, whatever you want to call  
5 it.

6 That's life. That's okay, you know.

7 Q. You met with Ms. Robinson and Canal  
8 employee Robin Chambers in December of 2018 --

9 A. Right.

10 Q. -- during which you threatened to  
11 give Ms. Robinson a bad recommendation if she  
12 left Canal, correct?

13 A. No, I didn't threaten to give her a  
14 bad reputation. I would never do that ever.

15 Q. Recommendation.

16 A. Huh?

17 Q. A bad recommendation.

18 A. A bad recommendation. I would not  
19 do that. I would not do that. I think maybe  
20 whatever Robin said, but I just wouldn't do  
21 that.

22 Q. Tell me what you remember about the  
23 meeting with Ms. Robinson and Robin Chambers in  
24 that December 2018 meeting.

25 A. I felt there was a bit of a

1 schmooze. She was getting Robin in to talk.  
2 And she was emotional and this and that. I said  
3 whatever.

4 We talked, dah, dah, dah, dah. But  
5 I'm not, you know -- I had nothing -- I was  
6 treating her well, I felt.

7 And so, she was getting emotional  
8 about certain things. I just -- do the work, do  
9 your job. That's all. I'm not, you know --  
10 I'll try to accommodate you to a point, and then  
11 you and I know both it would become ridiculous.

12 I didn't say that. But I'm not  
13 going to say if you leave me, I'm going to get  
14 you. I don't do that. That's not my style. I  
15 don't do it. I don't have the right to do it.  
16 I would never do it.

17 Q. All right.

18 MR. SANFORD: We're sharing a  
19 document with you in the chat that's  
20 Bates stamped CANAL 46031. It is a  
21 two-page document. It goes to 46032.  
22 And we're going to mark it for  
23 identification as Plaintiff's Exhibit  
24 115.

25 (Document bearing Bates

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Page 115

stamp Nos. CANAL 46031 through 46032  
was marked as Plaintiff's Exhibit  
115 for identification, as of this  
date.)

THE WITNESS: I'm sorry. I'm  
still looking at this one letter from  
Chase.

How do I change that or how do  
you remount it or whatever?

MR. BENNETT: You close that  
file. In the top left-hand corner,  
there should be a red button. Just  
click out of that.

THE WITNESS: I don't see any.  
Top right you mean? On my side it is  
the right.

MR. BENNETT: Right.

BY MR. SANFORD:

Q. You know, if it is too much of a  
bother --

A. I think I have it. I think we have  
it.

"Can we please finalize this? Not  
having this resolved has been stressful to me.  
I really appreciate it. Thank you so much."

Now, this is when? When is this  
letter? It is the 18th.

MR. BENNETT: Bob, go down.  
There's another e-mail.

THE WITNESS: Sorry, it is an  
e-mail.

MR. BENNETT: Look below that.  
There's another e-mail.

THE WITNESS: I'm sorry?

MR. BENNETT: Look below what you  
just read. On the same page, there's  
another e-mail from Chase to you.

THE WITNESS: Yes, I'm reading  
it.

BY MR. SANFORD:

Q. So do you see the December 18th  
e-mail?

A. I'm looking at it now. Can I take a  
minute to read it?

Q. Absolutely.

A. I need a minute.

Well, reading the first page already  
comparing herself to Dan -- comparing herself to  
Jane Rosenthal is ludicrous.

MR. BENNETT: Bob, just wait for

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Page 117

the question.

Okay?

BY MR. SANFORD:

Q. What makes that ludicrous,  
Mr. De Niro?

A. She does not do what Jane does and  
she does not do what Dan does. They're totally  
separate.

And I always felt with her that she  
was trying to find cracks in the structure that  
she could, in a way, undermine. And I tolerated  
that and I thought maybe she has some points.

Let me see. Let me look a little  
bit. I have not looked. I don't want to look.  
I don't want to find bad things. I don't --  
things are going okay. Let me not deal.

And then, but she is -- so I'm  
saying maybe I owe it to myself to look, at  
least. Doesn't mean I would make any decisions  
about it.

So this is what she is saying. And  
to me, in hindsight, again this is classic -- I  
was kind of aware of it then what she's trying  
to do. And I'm even allowing her to like do a  
little of it to see, to delve, to explore to see

what there is. And at the expense of the people  
who have been with me for years.

And as I say, if people do things  
with me and they make mistakes and they're not  
perfect. That's okay. That's life. That's how  
you create loyalty by people. When they're  
down, you help them and you forgive them and you  
let it go because everybody finds themselves in  
that situation. And that is -- so that's okay.

But she was always pushing for this,  
pushing for this. But I said okay, I'll listen.

Let me read the second part.

Q. Well, let me ask you a question  
about that part.

So Ms. Robinson is requesting a  
raise in 2018, right?

A. Yes.

Q. She wants --

A. She's comparing herself to Dan  
Harvey. She's comparing herself to Jane. I  
mean, that's ludicrous.

Q. All right.

I understand. I understand. I'm  
not asking about that.

A. She's getting paid pretty well,

30 (Pages 114 to 117)

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1 isn't she?

2 Q. I'm not asking about that.

3 A. You know she is getting paid well.

4 Q. Sir, I'm asking --

5 A. I know you're not supposed to  
6 answer. But you know that and I know that. We  
7 all know that.

8 Q. All right.

9 I'm asking a question and you're  
10 giving an answer.

11 A. Yes.

12 Q. My question is, she is asking for a  
13 change in base salary.

14 Did you and Ms. Robinson discuss --  
15 do you remember discussing a change to her  
16 compensation in late 2018?

17 A. You mean based on this letter?

18 Q. Based on anything you remember. I'm  
19 showing you a document to help you remember.

20 A. I don't, I don't know. We -- I'm  
21 not saying I did, but there's a good chance I  
22 could have because if she sent this letter, I  
23 have to address it.

24 Q. I'm showing you a document, sir, I'm  
25 showing you a document to help refresh your

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1 memory about what happened.

2 A. All right, can I just -- can I just  
3 read the second part for a second?

4 Q. Sure, go ahead.

5 A. Please don't go to Berdon for advice  
6 on this. It would be like me asking Trump for  
7 advice on a raise for Mueller for all his hard  
8 work. Give me a fucking break.

9 Even this I looked past because she  
10 is setting me up in a way. Let's do it between  
11 me and you. Because I know that I'll get you to  
12 agree to it, or she thinks she can.

13 And I really should involve my, my  
14 business people, my business manager in this,  
15 Berdon and so on. I should. That's procedure  
16 for me, and I probably did. I'm not sure.  
17 They'll tell you. I'm not sure.

18 Let me read the second part.

19 Please call Robin for fair advice.

20 Robin, now Robin has been kibbitzing with her a  
21 lot all this time, which I learned. Which  
22 that's interesting. And Robin, you know -- I  
23 feel bad for her because she shouldn't have  
24 gotten herself involved with this person who  
25 lured her into this lair of nonsense.

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1 Let me finish. While she is not --  
2 she figured she could get Robin to convince me  
3 that I should pay her more than -- let me  
4 finish. Sorry.

5 She is saying Robin has my best  
6 interests. She does. But sometimes she is  
7 naive, and I love Robin.

8 And then she says divert -- delete  
9 it so Kap doesn't see it. Well, you know, it is  
10 a little -- it is a little -- to me, a little, a  
11 little shady, but, you know...

12 Q. Bottom line is you spoke with  
13 Ms. Robinson about changing her compensation,  
14 correct?

15 A. Yes. I had to, I guess, after that.

16 Q. All right.

17 MR. SANFORD: I'm going to share  
18 with you a document in the chat that is  
19 Bates stamped CANAL 46038. And we're  
20 going to mark it for identification as  
21 Exhibit 116.

22 (Document bearing Bates  
23 stamp Nos. CANAL 46038 was marked as  
24 Plaintiff's Exhibit 116 for  
25 identification, as of this date.)

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1 BY MR. SANFORD:

2 Q. And I'm going to give you an  
3 opportunity to read it.

4 MR. SANFORD: Let's go off the  
5 record while you're doing it because I  
6 don't want to take time on the record.

7 MR. DROGIN: Can we extend that  
8 to like just a five-minute restroom  
9 break or come back at noon maybe?

10 MR. SANFORD: Let's do it.

11 THE VIDEOGRAPHER: The time is  
12 11:51 and we're going off the record.

13 (Whereupon, at 11:51 o'clock  
14 a.m., a recess was taken until 12:03  
15 o'clock p.m.)

16 THE VIDEOGRAPHER: The time is  
17 12:03. We are back on the record.

18 BY MR. SANFORD:

19 Q. We're back on the record. You  
20 understand, Mr. De Niro, you're still under  
21 oath?

22 A. Yes.

23 Q. And you've had a chance to read  
24 what's been marked as CANAL 46038, the  
25 January 3, 2019 e-mail from Ms. Robinson to you,

31 (Pages 118 to 121)



1 correct?

2 A. Yes.

3 Q. All right.

4 Do you recognize that document?

5 A. I don't recognize it, but I know she  
6 must have sent it to me, obviously.

7 Q. All right.

8 Having reviewed the document, does  
9 it help you recall a conversation you and  
10 Ms. Robinson had during that January 3rd  
11 meeting?

12 A. Was it on the 3rd of January that we  
13 had that meeting?

14 Q. Well, I apologize. Let me correct  
15 that.

16 I don't know when that meeting was.  
17 I'll just ask you do you remember having a  
18 meeting sometime in early January?

19 A. This is the one with Robin and  
20 Chase, you mean?

21 Q. Any meeting which I think was  
22 January 3rd between you and Ms. Robinson  
23 discussing issues concerning her compensation.

24 A. I'm just reading it again.

25 Yes, I mean, I don't know what it

1 means. We didn't conclude anything. It seems  
2 we talked about something, I guess about that,  
3 but it wasn't resolved. Maybe I'm wrong, but it  
4 doesn't seem like it was.

5 Q. Well, let me just ask you then.

6 Do you remember discussing any  
7 changes to Ms. Robinson's compensation in early  
8 January of 2018?

9 A. I don't, unless the conversation  
10 that I had that I was talking about where we  
11 went to the place around the corner from the  
12 upper school of my daughter's school, that's  
13 where we had that.

14 But, no, it couldn't have been then  
15 because this was before the holidays and I was  
16 telling her how I needed, you know, to get over  
17 this hump with everything; the divorce, the  
18 house, the holidays.

19 So, this I don't remember. If you  
20 can refresh my memory. I don't remember. I  
21 don't remember this.

22 Q. Well, do you remember telling  
23 Ms. Robinson that Dan Harvey needed to be paid  
24 more than Ms. Robinson because Mr. Harvey had a  
25 family to support?

1 A. No.

2 Q. You don't remember ever saying that?

3 A. No, no.

4 Q. You might have said it; you just  
5 don't remember?

6 MR. BENNETT: Objection.

7 A. I don't know. I don't remember.  
8 BY MR. SANFORD:

9 Q. All right.

10 Do you remember Ms. Robinson telling  
11 you during the meeting in early January 2019  
12 that she no longer wanted to be involved in the  
13 townhouse?

14 A. I must -- if you have an e-mail or  
15 something, I'll read it and I'm sure I'll say  
16 okay.

17 Q. Do you remember telling Ms. Robinson  
18 during that early January 2019 meeting that she  
19 should complete several more items regarding the  
20 townhouse?

21 A. You mean on January 3rd, telling her  
22 this or later?

23 Q. Around January 3rd.

24 A. I don't remember, but I might have.  
25 I don't remember.

1 Q. And by townhouse, I'm referring to

2 [REDACTED]  
3 A. Yes.

4 Q. Right.

5 Do you remember discussing with  
6 Ms. Robinson at this early January 2019 meeting  
7 any change to her job responsibilities?

8 A. No.

9 Q. Do you remember promising  
10 Ms. Robinson during this early January 2019  
11 meeting that her work conditions would improve?

12 A. Well, I don't know what the work  
13 conditions were that were bad in the first  
14 place.

15 Q. So is the answer "no"?

16 A. I guess it is a no because I don't  
17 know what she, you know -- other than making her  
18 feel good and just consoling her because she was  
19 feeling, I don't know what, you know. I don't  
20 know.

21 Q. So is the answer "yes"?

22 A. I don't know. I don't know what to  
23 answer to that because I don't know what -- yes,  
24 I just don't know.

25 Q. So just to be clear on the record,

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1 you don't know whether you promised Ms. Robinson  
2 that her work conditions would improve during  
3 the meeting with her in early January 2019?

4 MR. DROGIN: Objection to the  
5 form.

6 You can answer, Bob.

7 A. I can't -- I don't know what she's  
8 talking about. If she said you promised me  
9 this, you promised me that, you promised me  
10 this, I'd say well, I did promise you that, but  
11 not this and not that.

12 But I don't see any of that here. I  
13 don't know what she is talking about.

14 BY MR. SANFORD:

15 Q. All right.

16 You were the final decision maker  
17 when it came to employee salaries at Canal,  
18 right?

19 A. Yes.

20 Q. Ms. Robinson could not set employee  
21 salaries without your approval, right?

22 A. Yes.

23 MR. BENNETT: Objection.

24 BY MR. SANFORD:

25 Q. You were the final decision maker

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1 when it came to employee bonuses at Canal,  
2 right?

3 A. I was made aware and then I would  
4 say okay.

5 Q. Ms. Robinson could not set employee  
6 bonuses without your approval, correct?

7 A. Yes, I mean, she should -- I mean,  
8 the only thing I think of is after a couple of  
9 years is she knew this would be the norm. We do  
10 the same as last year. That's the only thing.

11 But if anything was changing or  
12 anything was up or this and that, she was  
13 obligated to make me aware of that.

14 Q. You were the final decision maker  
15 when it came to hiring employees at Canal,  
16 correct?

17 A. Yes.

18 Q. Ms. Robinson could not make an offer  
19 of employment without your approval, right?

20 A. Yes, but I don't know what -- you're  
21 asking me a question that I'm waiting for some  
22 kind of curve ball to come and say -- yes.

23 Q. There's no curve ball, Mr. De Niro.  
24 I'm just asking a simple question and asking for  
25 simple answers.

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1 A. To you guys, I don't know. But  
2 anyway.

3 Q. So the answer to my question --  
4 Ms. Robinson could not make an offer of  
5 employment without your approval, right?

6 A. That's probably, yes.

7 Q. All right.

8 You were the final decision maker --

9 A. Sorry, go ahead.

10 Q. I'm sorry?

11 A. At face value what it said, I could  
12 say yes.

13 Q. Okay.

14 You were the final decision maker  
15 when it came to terminating employees at Canal,  
16 correct?

17 A. Yes, yes.

18 Q. Ms. Robinson could not terminate an  
19 employee without your approval, right?

20 A. No.

21 Q. That is to say she could not  
22 terminate?

23 A. No, she couldn't. The people in the  
24 office, in my immediate office, that's all, the  
25 only jurisdiction she would have. And she would

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1 have to run that by me, yes.

2 Q. Okay.

3 You were the final decision maker  
4 when it came to Canal's policies, correct?

5 A. Yes.

6 Q. And Ms. Robinson could not implement  
7 an office policy of significance without your  
8 approval, right?

9 MR. BENNETT: Objection.

10 A. She couldn't, but we don't know -- I  
11 don't know what she did in my name and said that  
12 I approved it. I wouldn't at this point put  
13 things past her knowing what she has done.

14 So I have to think about that and  
15 know exactly what she did or what was done that  
16 I got my approval or not.

17 BY MR. SANFORD:

18 Q. I'm not asking what, in fact,  
19 happened. I'm just saying as a matter of  
20 policy, you needed to approve, you know --

21 A. As a matter of policy that is honest  
22 and transparent and well-meaning and positive,  
23 yes.

24 Q. Okay.

25 You were the final decision maker

33 (Pages 126 to 129)

1 when it came to how many vacation days employees  
2 at Canal received, right?

3 A. Yes. I didn't look at that closely  
4 sometimes and I didn't look at it closely with  
5 her at times. Again, it was the honor system.  
6 I relied on her to do the right thing.

7 Q. Did you ever seek to have your  
8 employees perform work without paying them  
9 overtime?

10 A. No.

11 Q. Approximately one month before her  
12 resignation, did Ms. Robinson tell you that you  
13 needed to pay your female executive assistants  
14 overtime if they performed work for you over the  
15 weekend?

16 A. Can you repeat that? I'm sorry.

17 Q. Sure.

18 Approximately one month before her  
19 resignation, did Ms. Robinson tell you that you  
20 needed to pay your female executive assistants  
21 overtime if they performed work for you over the  
22 weekend?

23 A. Do I remember her saying that to me?

24 Q. Yes. Do you remember that?

25 A. I'm not sure. But if she said I had

1 to pay them overtime, I don't see why I wouldn't  
2 do what she says I have to do.

3 Q. You don't dispute that at times you  
4 called Ms. Robinson a bitch, right?

5 A. No, I never called her a bitch,  
6 never. Never, never, never, ever, ever, ever to  
7 her face.

8 And if I called her a bitch, it  
9 would never be to her face. And I didn't call  
10 her a bitch not to her face. So she can't pull  
11 that one.

12 Q. Have you ever called anyone a bitch?

13 A. What do you think? That's a stupid  
14 question.

15 Of course I called people bitches -  
16 but not her - and I do it when it is appropriate  
17 and when you're venting. But not to a person to  
18 insult them and degrade them. I would never do  
19 that.

20 Q. You don't dispute that at times you  
21 called Ms. Robinson a brat, do you?

22 A. I might have said that. I don't  
23 remember, but I might have.

24 Q. Who is Jane Rosenthal?

25 A. She is my partner at TriBeCa.

1 Q. And at times you described  
2 Ms. Rosenthal as a cunt to Ms. Robinson?

3 A. No, no, I have never done that. I  
4 would never, ever, ever say anything like that  
5 to Chase Robinson. Never ever.

6 That's the kind of thing she would  
7 want to hear me say. That's in her mind.  
8 That's an allusion. Never ever would I do that.

9 Q. Well, did you call Ms. Rosenthal a  
10 cunt to anyone else besides Ms. Robinson?

11 A. No, no, no, no.

12 Q. Have you called any other woman a  
13 cunt?

14 A. That's none of your business.

15 MR. SANFORD: We're sharing a  
16 document with you in the chat that is  
17 Bates stamped CANAL 9189 through 9190,  
18 which is a February 13, 2019 e-mail  
19 exchange between Tiffany Chen and Robert  
20 De Niro and Chase Robinson. And I'm  
21 going to mark for identification this  
22 document as Exhibit 117.

23 (Document bearing Bates  
24 stamp Nos. CANAL 9189 through 9190  
25 was marked as Plaintiff's Exhibit

1 117 for identification, as of this  
2 date.)

3 MR. SANFORD: Let's go off the  
4 record for a minute while Mr. De Niro  
5 has a chance to review the document.

6 THE VIDEOGRAPHER: The time is  
7 12:14 and we are going off the record.

8 (Whereupon, at 12:14 o'clock  
9 p.m., a recess was taken until 12:16  
10 o'clock p.m.)

11 THE VIDEOGRAPHER: The time is  
12 12:16. We are back on the record.

13 BY MR. SANFORD:

14 Q. Mr. De Niro, you have before you  
15 what has been marked as CANAL 9189 to 9190,  
16 which is a February 13, 2019 e-mail exchange.

17 Have you had an opportunity to  
18 review it?

19 A. Yes.

20 Q. Do you remember it?

21 A. Not -- I don't know. What's the  
22 point of everything in this e-mail?

23 Q. Well, if you look at the top of the  
24 page, do you see where you write "I'm getting  
25 them when meet one of the girls from office at

1 NBC?"

2 Do you see that?

3 A. Yes.

4 Q. Who are you referring to when you  
5 talk about the girls?

6 A. I'm not sure.

7 Q. You don't remember?

8 A. No, I'm not sure. I don't know what  
9 it is, NBC. NBC the network. NBC a design  
10 place. I'm not sure.

11 Q. All right.

12 At times you joked with Ms. Robinson  
13 about your [REDACTED] didn't you?

14 A. No, I don't joke about that. I  
15 trusted her enough to get it and I don't joke  
16 about it.

17 And if there was ever a little joke  
18 of a certain thing totally within proper bounds  
19 maybe, and I don't think I would ever do that.  
20 I didn't do those kinds of things.

21 And the fact that she would say that  
22 makes me wonder about her even more. I mean,  
23 this is nuts.

24 Q. On one occasion --

25 A. I get them and I don't talk about my

1 Viagra thing. I don't talk about it. It is  
2 private.

3 It is bad enough that I have to have  
4 them get it for me. I'm going to start joking  
5 about it? What is this? What is she telling  
6 you?

7 Q. On one occasion you told  
8 Ms. Robinson that manual labor would make a man  
9 out of her, didn't you?

10 A. Oh, I don't know if I did. But if I  
11 did, what's wrong with saying that?

12 Q. On one occasion you told  
13 Ms. Robinson that she could use Michael Kaplan's  
14 sperm to get pregnant; didn't you?

15 A. No, I didn't say that. I never said  
16 that.

17 Q. So if Ms. Robinson testifies under  
18 oath that you did, would she be lying?

19 A. She would be lying.

20 Q. When did Ms. Robinson begin to have  
21 interactions with your girlfriend, Tiffany Chen?

22 A. I don't know. It was the beginning  
23 of when I first -- after I first introduced her,  
24 and I forget the time.

25 Maybe the fall of -- maybe it was a

1 little over three years ago. Say if it was last  
2 fall, that would be three years from last fall,  
3 I suppose, would be the time.

4 Q. Did Ms. Chen ever tell you that in  
5 her opinion, Ms. Robinson is a bitch?

6 A. Not that I remember, but she could  
7 have.

8 Q. Did Ms. Chen ever tell you that from  
9 her perspective, Ms. Robinson was hysterical?

10 A. She could have.

11 Q. Did Ms. Chen ever tell you from her  
12 perspective, Ms. Robinson was emotionally  
13 disturbed?

14 A. I'm not sure I would remember that,  
15 but, you know, it could be.

16 Q. Did Ms. Chen ever tell you that from  
17 her perspective, Ms. Robinson was crazy?

18 A. I don't know if -- I don't know. I  
19 don't remember.

20 Q. Did Ms. Chen ever tell you that from  
21 her perspective, Ms. Robinson was in love with  
22 you?

23 A. There was some talk about that.

24 Q. What was the talk?

25 A. That she thought that maybe she was

1 because of certain things she bought in the  
2 house and stuff like that and that she was so  
3 territorial about it.

4 And I never -- I mean, I was like  
5 dumbfounded. I just didn't even know how to  
6 react to that.

7 Q. Would you and Ms. Chen fight about  
8 that issue?

9 A. No.

10 Q. Did Ms. Chen ever tell you that from  
11 her perspective, Ms. Robinson wanted to be  
12 married to you?

13 A. I don't remember that.

14 Q. Did Ms. Chen ever tell you that from  
15 her perspective, Ms. Robinson wanted to move in  
16 with you?

17 A. Yes, there was a little of that  
18 wondering.

19 Q. What, to your best recollection, was  
20 said?

21 A. It was just that, that simple.

22 Q. That Ms. Robinson wanted to move in  
23 with you?

24 A. Yes.

25 Q. Did you ever think Ms. Robinson

1 wanted to move in with you?

2 A. I don't know anymore. She acted  
3 like sometimes a little petulant. Like a  
4 little, maybe the brat thing, too, whatever I  
5 said but where she would say no, he doesn't want  
6 that. He'll do this. He'll do that.

7 And she would do that with Tiffany  
8 and it was inappropriate. She should have just  
9 said this is what you want, of course. It is  
10 not for her. But she was getting territorial  
11 and being disrespectful and being disrespectful  
12 to me.

13 But I tolerated it because she did  
14 it to me. I said I don't mind. She's really  
15 very good once she works. She does it. And so,  
16 this is what it was.

17 Q. Did you ever perceive that  
18 Ms. Robinson wanted to be married to you?

19 A. I don't know. I don't --

20 Q. Did you ever think that Ms. Robinson  
21 was in love with you?

22 A. I don't know.

23 Q. Did you ever think Ms. Robinson was  
24 crazy?

25 A. A little.

1 very neurotic.

2 Q. When did that first cross your mind  
3 that Ms. Robinson was neurotic?

4 A. I don't know. Just she made -- she  
5 just made stress and duress for people that  
6 really she didn't -- if she was smart, she  
7 shouldn't have done that.

8 Q. Did you ever think that Ms. Robinson  
9 was hysterical?

10 A. I don't know. There could be times.  
11 Borderline. She wouldn't show it to me, but I  
12 have a feeling she would show it to other  
13 people.

14 Q. Did you ever think that Ms. Robinson  
15 was a terrible person?

16 A. I can't say she is a terrible  
17 person. She is not a terrible person. I think  
18 she is confused and feels that she is entitled  
19 to things that she's not entitled.

20 When she was questioning the motives  
21 and the salaries and the positions of people  
22 like Jane Rosenthal, of Berdon, of Dan Harvey,  
23 yes, I started wondering.

24 At the same time, you know, like  
25 someone whispers in your ear you kind of half

1 Q. Why do you say that?

2 A. I think she's delusional. She  
3 wants, she wants an important position. She  
4 doesn't know how to get it. She pushed with  
5 silly things like a title.

6 She didn't know that do your job, be  
7 straight, be honest, be forthcoming, be  
8 transparent. Just do the thing. Don't make  
9 assumptions that you know my taste. Don't say  
10 he doesn't like that, he likes this. That was  
11 not for her to do. I tolerated it.

12 But, you know, at one point it can  
13 be annoying to me and to other people who are  
14 close to me. It is not for her to do that. And  
15 I think that was childish of her to do it. And  
16 she had no right to do it.

17 What can I say? You know, I  
18 tolerated it. You know, it is what she does.  
19 But, you know, it is not really right.

20 Q. Did you ever think Ms. Robinson was  
21 emotionally disturbed?

22 A. That crossed my mind.

23 Q. When did it first cross your mind?

24 A. I don't remember. Just, I don't  
25 know, just -- if not emotionally disturbed, just

1 listen because you never know. And I thought,  
2 she reminds me of that woman Elizabeth Holmes of  
3 Theranos. They tell you that they're pretty.  
4 They tell you -- they tell you certain things.  
5 Everybody bought into her con.

6 And Chase in a way felt entitled and  
7 would say these things. And maybe you guys as  
8 her lawyers have also bought into her nonsense  
9 and finally just following through because you  
10 have to. But, that's what I feel about her.

11 Q. What do you feel Ms. Robinson was  
12 entitled to?

13 MR. DROGIN: Objection to the  
14 form.

15 A. Huh?

16 BY MR. SANFORD:

17 Q. You testified moments ago that you  
18 felt that Ms. Robinson was entitled.

19 My question is: What was she  
20 entitled to?

21 A. She was entitled to be the boss.  
22 She wanted to control my situation if she could  
23 have. If she could have controlled all my  
24 finances. Jane Rosenthal would have been out on  
25 the street. Dan Harvey wouldn't have been



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1 training me anymore. And I suppose she would  
2 have done it. So there you go. She was jealous  
3 of Dan Harvey. She was jealous of everybody  
4 that I began to see.

5 Q. Ms. Robinson was your employee for  
6 approximately 11 years, correct?

7 A. Correct.

8 Q. Ms. Robinson knew more about your  
9 life personal and professional than anyone else;  
10 isn't that right?

11 A. She knew a lot. She didn't know  
12 everything, but she knew a lot.

13 Q. She knew more about your personal  
14 life and your professional life than anyone else  
15 in your life; isn't that correct?

16 MR. DROGIN: Objection to the  
17 form.

18 A. No.

19 BY MR. SANFORD:

20 Q. Who knew more than Ms. Robinson?

21 A. That's none of your business.

22 MR. DROGIN: Objection.

23 BY MR. SANFORD:

24 Q. I get -- hold on a second, Counsel.

25 I get to ask the question and you get to answer

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1 my question.

2 A. I answered it. I answered it. What  
3 the hell does that have to do with anything?  
4 But just trying to harass me and embarrass me.

5 Q. I'm asking you a simple question.

6 A. You're asking a devious question.  
7 You ought to be ashamed of yourself.

8 MR. DROGIN: Okay.

9 In that respect, since the  
10 witness indicates he feels harassed, I'm  
11 going to direct him not to answer your  
12 question.

13 THE WITNESS: Period.

14 MR. SANFORD: So any time -- on  
15 your view you get to direct not to  
16 answer when a witness feels harassed, is  
17 that your view of the rules?

18 MR. DROGIN: If the witness is  
19 telling you that you're harassing him,  
20 then I'm going to agree with the  
21 witness.

22 MR. SANFORD: Then your view of  
23 the rules is that you can direct not to  
24 answer under conditions of harassment?

25 MR. DROGIN: My view of the

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1 rules, sir, is that you don't bring  
2 frivolous claims, but that's exactly  
3 what you have done.

4 (Whereupon, the transcript  
5 was marked for a direction not to  
6 answer.)

7 BY MR. SANFORD:

8 Q. All right.

9 Mr. De Niro, I'm going to ask you  
10 again, was there anyone besides Ms. Robinson who  
11 knew more about your personal and professional  
12 life during the 11 years that she served as your  
13 employee?

14 A. That is none of your business.

15 MR. DROGIN: I'll also object to  
16 the form.

17 BY MR. SANFORD:

18 Q. Well, let me ask you this, Mr. De  
19 Niro: Is there anyone, I'm not asking you who,  
20 but is there any one besides Ms. Robinson, other  
21 than Ms. Robinson --

22 A. What's the point of that question?  
23 I'm not going to answer that question.

24 Q. Can I ask, would you give me the  
25 respect, sir, of allowing me to finish?

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1 A. I'm giving you give the respect.  
2 You give me the respect. I'm not answering that  
3 question.

4 Q. Can you give me the respect, sir, of  
5 allowing me to finish my question before you  
6 answer?

7 Will you give me that respect?

8 A. I know where you're going. Excuse  
9 me.

10 Q. Will you give me that respect  
11 because I would like to have a clean record. It  
12 is in your interest and everyone's interest.

13 A. You have a clean record and you have  
14 a clean answer. What does it have to do with  
15 Chase Robinson? And you're trying to say at the  
16 end of the day, oh, nobody knew him better than  
17 her and this and that. No, no, I'm sorry.  
18 You're going into places you shouldn't go. It  
19 is none of your business.

20 Q. I'm not going anywhere. I just want  
21 to know --

22 A. You're not, huh? I'm sorry, you  
23 are.

24 Q. My question is: Is there anyone  
25 other than Ms. Robinson who knew more than Ms.

37 (Pages 142 to 145)

1 Robinson about your personal and professional  
2 life during the 11 years in which she was  
3 employed by you?

4 MR. DROGIN: Objection to the  
5 form.

6 A. I, I can't even answer that.

7 BY MR. SANFORD:

8 Q. You can't answer it because you  
9 don't know?

10 A. Yes, because --

11 MR. DROGIN: Objection to the  
12 form.

13 A. I'll give you that answer. How is  
14 that?

15 MR. DROGIN: Do you want to  
16 suggest a metric or do you just want to  
17 leave it as vague and ambiguous?  
18 Because it is a trick question.

19 THE WITNESS: Of course it is.

20 MR. SANFORD: Counsel, we have a  
21 stipulation on the record that you will  
22 object to form.

23 If you want to have a speaking  
24 objection, which is improper, that's  
25 another thing we can talk about with the

1 court, which we will.

2 Right now my question is --

3 MR. DROGIN: It is on the record  
4 and there have been very few speaking  
5 objections. So I think every now and  
6 then a speaking objection is okay,  
7 especially when it is in this line of  
8 questioning and it is very, very clear  
9 what's happening.

10 MR. SANFORD: There aren't  
11 exceptions to stipulations that I know  
12 of that we entered.

13 MR. DROGIN: Any time you want to  
14 call the judge we're willing to do so.

15 BY MR. SANFORD:

16 Q. Mr. De Niro, so you're not going to  
17 answer my question; is that right?

18 A. No, I'm not going to answer it.

19 Q. All right.

20 You understand that if I go to the  
21 court and the court allows me to get back on the  
22 record with you to ask these questions again,  
23 you're going to be compelled to answer; you  
24 understand that?

25 A. I will answer it in the way that I

1 answer. I'm not going to answer it if it has no  
2 relevance to this. And you're trying to set me  
3 up in a way that I just won't go along with.

4 Q. At times you urinated during your  
5 telephone calls with Ms. Robinson; didn't you?

6 A. That -- I'm in the bathroom. What  
7 are you trying to say with a question like that?

8 Q. I'm just asking you a question.

9 A. Aren't you ashamed of yourself to  
10 ask a question like that? Can't you go to the  
11 bathroom and be on the phone and if somebody  
12 hears you urinating by mistake that's not -- I  
13 didn't do it, I didn't do it intentionally, if I  
14 did it.

15 Please, are we getting a little --  
16 are we not going a little too low now?

17 Q. So the answer is "yes"?

18 A. No, this is nonsense.

19 Q. So the answer is "yes"?

20 A. I'll say yes, I might have. But  
21 you're making it like I did it as some kind of  
22 lewd sort of weird thing.

23 Q. At times you met Ms. Robinson  
24 wearing your pajamas, right?

25 A. No. And if I -- I can't even answer

1 these questions.

2 Q. You don't remember?

3 A. I don't remember.

4 Q. At times you met Ms. Robinson  
5 wearing a bathrobe; didn't you?

6 MR. DROGIN: Objection to the  
7 form.

8 A. Yes, this is nonsense.

9 MR. DROGIN: I'm sorry, who is  
10 wearing the bathrobe? Listen to the  
11 question.

12 Who's wearing the bathrobe?

13 BY MR. SANFORD:

14 Q. Mr. De Niro, you wore a bathrobe at  
15 times when you met Ms. Robinson, correct?

16 A. What's, what's the reason for the  
17 question?

18 Q. Are you going to answer my question?

19 A. No, I'm not. What's the reason for  
20 the question? Are you implying that I wore a  
21 bathrobe and, therefore, I was doing something  
22 improper with her?

23 MR. DROGIN: Mr. Sanford --

24 BY MR. SANFORD:

25 Q. Mr. De Niro, I ask you questions to

1 you.

2 A. Yes, and I'm answering them. You're  
3 not going to, you're not going to make me look  
4 like an idiot and embarrass me and humiliate me.  
5 Excuse me.

6 Q. So the answer is "yes" or "no"?

7 A. No.

8 Q. You did not wear a bathrobe with Ms.  
9 Robinson?

10 A. No.

11 MR. DROGIN: Mr. Sanford, if you  
12 would like, we will go off the record  
13 and explain to Mr. De Niro what the  
14 rules are about answering your  
15 questions.

16 MR. SANFORD: Well, you can tell  
17 him on the record. We can do that right  
18 now.

19 A. No, you're implying that by wearing  
20 a bathrobe there's something going on. There's  
21 some impropriety. That you shouldn't do.  
22 That's bullshit and you know it.

23 MR. DROGIN: Listen --

24 A. And you're grabbing for straws. And  
25 how can I not be upset?

1 BY MR. SANFORD:

2 Q. Mr. De Niro, at times you asked Ms.  
3 Robinson to come into your bedroom to wake you  
4 up; didn't you?

5 A. No, I didn't. Never. Never.  
6 Never. Never. Period.

7 Q. All right.

8 At times you asked Ms. Robinson to  
9 meet with you alone in your apartment; didn't  
10 you?

11 A. No. I didn't ask her. She came  
12 over because I had to talk to her.

13 Q. At times you asked Ms. Robinson to  
14 meet with you alone to help you --

15 A. What's the implication by having her  
16 meet in my apartment? What are you trying to  
17 say? What do you think I'm stupid? This is  
18 ridiculous.

19 Q. Mr. De Niro, at times you asked Ms.  
20 Robinson to meet with you alone in a hotel  
21 suite; didn't you?

22 A. She works for me. She booked the  
23 hotel rooms for me when I would go on location.

24 Q. At times you asked Ms. Robinson to  
25 scratch your back; didn't you?

1 A. Listen -- no.

2 Q. At times you asked Ms. Robinson to  
3 button your shirts; didn't you?

4 A. No.

5 Q. At times you asked Ms. Robinson to  
6 fix your collars; didn't you?

7 A. No.

8 Q. At times you asked Ms. Robinson to  
9 tie your ties; didn't you?

10 A. I tied my tie. I asked her which  
11 tie should I wear, this one or this one. When  
12 I'm in the office, the door is open to the  
13 other. And I'm just saying, I've got to go down  
14 and do an interview. What do you think, this  
15 tie or that tie?

16 Q. Do you recall an instance in which  
17 Harvey Keitel slapped Ms. Robinson --

18 A. No, he wouldn't do that.

19 Q. Let me finish my question, sir.  
20 Please give me that respect.

21 A. Don't you feel ashamed of yourself?  
22 Don't you feel ashamed of yourself? You go home  
23 and tell your kids these are the kinds of  
24 questions you asked me.

25 Q. Mr. De Niro, I would ask for --

1 A. You ought to be ashamed of yourself.  
2 Period.

3 Q. I would ask you to respect me enough  
4 to --

5 A. You're not respecting me by asking  
6 these questions. I know you're doing your job  
7 but you're not respecting me.

8 Q. My question, sir, is do you recall  
9 an instance in which Harvey Keitel slapped Ms.  
10 Robinson on her buttocks?

11 A. No, I don't.

12 Q. Ms. Robinson put your boxers in  
13 drawers in your bedroom in your townhouse;  
14 didn't she?

15 MR. DROGIN: Objection to the  
16 form.

17 A. No, that's a, that's an inane  
18 question.

19 BY MR. SANFORD:

20 Q. Is that a "no"?

21 A. Yes, it would have to be a "no".

22 Q. Ms. Robinson hung up your clothes in  
23 your townhouse; didn't she?

24 MR. DROGIN: Objection to the  
25 form.



1 You can answer it.  
 2 A. Yes, she might have put the stuff in  
 3 when she got the closets, some of the stuff that  
 4 was part of her, even Sabrina, she had gotten in  
 5 once or twice. This girl Lulu who worked for  
 6 her. I don't know, Lulu where she is now.  
 7 Other people. You know, even Michael Kaplan  
 8 could have hung something up for me.  
 9 BY MR. SANFORD:  
 10 Q. Who is Robin Chambers?  
 11 A. She is a person who used to work for  
 12 me. She was my old assistant.  
 13 Q. She is an honorable person; isn't  
 14 she?  
 15 A. I think so.  
 16 Q. You don't think she would lie under  
 17 oath, do you?  
 18 MR. DROGIN: Objection to the  
 19 form.  
 20 A. I don't know. I don't know that. I  
 21 mean, I just don't know.  
 22 BY MR. SANFORD:  
 23 Q. You wouldn't dispute Ms. Chambers'  
 24 sworn testimony that Ms. Robinson ironed your  
 25 shirts, would you?

1 MR. DROGIN: Objection to the  
 2 form.  
 3 A. This is nonsense. This is like  
 4 bottom feeding. Get away from me. You've got  
 5 to be kidding me.  
 6 BY MR. SANFORD:  
 7 Q. Is that a "yes"?  
 8 A. No.  
 9 Q. That's a "no"?  
 10 A. No.  
 11 Q. Ms. Robinson at times washed your  
 12 sheets and towels; didn't she?  
 13 A. If she did, yes, so what. I don't  
 14 even remember if she did.  
 15 Q. Ms. Robinson would at times vacuum  
 16 your house; wouldn't she?  
 17 A. I don't know that.  
 18 Q. She might have, you don't remember?  
 19 A. I don't know that. That was not her  
 20 job. So if she did that, she did it maybe once  
 21 in all the years I knew her and I don't even  
 22 remember if she did that.  
 23 Q. Ms. Robinson would at times set the  
 24 table at your home; wouldn't she?  
 25 MR. DROGIN: Objection to the

1 form.  
 2 You can answer.  
 3 A. I don't remember.  
 4 BY MR. SANFORD:  
 5 Q. Is that right?  
 6 A. I don't remember that.  
 7 Q. Do you remember Martin Scorsese's  
 8 birthday party at your house?  
 9 A. No. I don't even remember. When  
 10 was that? How long ago was that?  
 11 Q. I'm asking you.  
 12 Do you remember it at all?  
 13 A. I don't remember.  
 14 Q. Do you remember having a birthday  
 15 party at your house for Martin Scorsese?  
 16 A. When, what year was this?  
 17 Q. Any year you can remember.  
 18 A. I can't remember it.  
 19 Q. Ms. Robinson would at times mend  
 20 your clothing, correct?  
 21 A. No, she wouldn't.  
 22 Q. Ms. Robinson would at times select  
 23 gifts for your children; wouldn't she?  
 24 A. That might be so, yes.  
 25 Q. Okay.

1 A. With me.  
 2 Q. It is not that it might be so, you  
 3 have already testified that it is so?  
 4 MR. BENNETT: Objection.  
 5 A. Well, then it is. Whatever. That's  
 6 fine.  
 7 BY MR. SANFORD:  
 8 Q. Ms. Robinson would at times make  
 9 your bed; wouldn't she?  
 10 A. No.  
 11 Q. Ms. Robinson would at times --  
 12 A. Is she trying to say that she used  
 13 to make my bed? This is nonsense.  
 14 Q. Ms. Robinson would at times  
 15 organize your closets; wouldn't she?  
 16 A. That, she did a little of, yes,  
 17 because she ordered the closet. California  
 18 Closets. And she did it wrong too, by the way.  
 19 Q. Okay.  
 20 Ms. Robinson would routinely  
 21 throughout her tenure at Canal oversee your  
 22 schedule; wouldn't she?  
 23 A. Yes.  
 24 Q. Ms. Robinson would remind you to  
 25 take and refill your medicine; wouldn't she?

1 A. She wouldn't remind me. I knew.  
 2 She would refill my medicine. She didn't do  
 3 that. See, right now these are questions like  
 4 she is a wife or something or my assistant. I  
 5 don't know what this is. What this implies.  
 6 But it is creepy.  
 7 Q. Ms. Robinson would routinely  
 8 communicate with your doctors; wouldn't she?  
 9 A. No.  
 10 MR. DROGIN: Objection to the  
 11 form.  
 12 BY MR. SANFORD:  
 13 Q. Ms. Robinson would arrange furniture  
 14 deliveries for you; wouldn't she?  
 15 A. That, yes, she would do.  
 16 Q. Ms. Robinson would routinely arrange  
 17 flower deliveries for you; wouldn't she?  
 18 A. That, she could do.  
 19 Q. Ms. Robinson would help organize and  
 20 decorate parties for you; wouldn't she?  
 21 A. That, she could do.  
 22 Q. Ms. Robinson would arrange your  
 23 travel via private jet; wouldn't she?  
 24 A. That, she could do.  
 25 Q. Ms. Robinson -- and when you say she

1 could do, she did do it, right?  
 2 A. She did.  
 3 Q. Ms. Robinson would routinely run  
 4 errands for the Canal office and for you and  
 5 your family; wouldn't she?  
 6 MR. BENNETT: Objection.  
 7 A. Yes.  
 8 BY MR. SANFORD:  
 9 Q. Ms. Robinson would RSVP to events on  
 10 your behalf; wouldn't she?  
 11 A. Yes.  
 12 Q. Ms. Robinson would at times field  
 13 media requests on your behalf; wouldn't she?  
 14 MR. BENNETT: Objection.  
 15 A. Yes.  
 16 BY MR. SANFORD:  
 17 Q. Ms. Robinson would generally remind  
 18 you to pick out gifts; wouldn't she?  
 19 A. She could. Her job was to remind  
 20 me. I say remind me, there's a list, I have to  
 21 get these particular gifts for certain people  
 22 for their birthday, for Christmas, whatever,  
 23 yes.  
 24 Q. Ms. Robinson often accompanied you  
 25 while you picked out gifts for family and close

1 familiar friends; wouldn't she?  
 2 MR. DROGIN: Objection to form.  
 3 A. Yes.  
 4 BY MR. SANFORD:  
 5 Q. Ms. Robinson would generally help  
 6 manage your contacts list; wouldn't she?  
 7 MR. BENNETT: Objection.  
 8 A. Yes.  
 9 BY MR. SANFORD:  
 10 Q. Ms. Robinson would coordinate your  
 11 award show votes; wouldn't she?  
 12 A. My award show what?  
 13 Q. Votes.  
 14 A. Well, help set it up for me and then  
 15 I would do my own voting. It wasn't like she  
 16 was part of.  
 17 Q. And by that, I mean the Oscar votes,  
 18 right?  
 19 MR. BENNETT: Objection.  
 20 A. Yes, but that's in the computer.  
 21 Not -- that's all she did.  
 22 BY MR. SANFORD:  
 23 Q. Ms. Robinson would often look up  
 24 restaurants for you; wouldn't she?  
 25 A. Yes.

1 Q. I'm sorry?  
 2 A. Yes, she did.  
 3 Q. Ms. Robinson would vet vacation  
 4 rentals for you; wouldn't she?  
 5 A. Yes, she did.  
 6 Q. Ms. Robinson vetted home rentals for  
 7 you; wouldn't she?  
 8 A. Yes, she did.  
 9 Q. Ms. Robinson researched potential  
 10 schools for your son; didn't she?  
 11 A. She might have done some, yes.  
 12 Q. Ms. Robinson assisted with your  
 13 pets; didn't she?  
 14 A. She might have.  
 15 Q. When you say might have, you're  
 16 saying "yes"?  
 17 A. I don't know because I have pets.  
 18 We had pets. Tiffany had pets. I don't know.  
 19 That was the overlap. So I don't know.  
 20 Q. Ms. Robinson scouted hotels all over  
 21 the world for you; didn't she?  
 22 A. Not all -- wherever I had to go on  
 23 location she did go. I trusted her to go do  
 24 that.  
 25 Q. Ms. Robinson researched options for

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1 the purchase of your bed; didn't she?  
 2 A. The purchase of my bed? Yes. My  
 3 furniture. All my furniture, yes.

4 Q. Ms. Robinson helped buy furnishings  
 5 for your home; didn't she?

6 A. She did, yes.

7 Q. Ms. Robinson vetted housekeepers for  
 8 you; didn't she?

9 A. Yes.

10 Q. Ms. Robinson researched options for  
 11 planters and pots for your plants; didn't she?

12 A. Yes.

13 Q. Ms. Robinson assisted with the  
 14 delivery of your plants; didn't she?

15 A. Yes.

16 Q. Ms. Robinson went plant shopping  
 17 with you; didn't she?

18 A. Yes, yes.

19 Q. Ms. Robinson went antique shopping  
 20 with you?

21 A. Yes, she did.

22 THE VIDEOGRAPHER: The time is  
 23 12:41. We are going off the record for  
 24 technical reasons.

25 (Whereupon, at 12:41 o'clock

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1 p.m., a recess was taken until 12:43  
 2 o'clock p.m.)

3 THE VIDEOGRAPHER: The time is  
 4 1243. We are back on record.

5 BY MR. SANFORD:

6 Q. Mr. De Niro, you understand you're  
 7 still under oath?

8 A. Yes.

9 Q. All right.

10 Ms. Robinson collected photo options  
 11 to be framed for your home; didn't she?

12 A. What was that again?

13 Q. Ms. Robinson collected photo options  
 14 to be framed for your home, correct?

15 A. Yes, uh-hum.

16 Q. Ms. Robinson researched options for  
 17 talents; didn't she?

18 A. Yes, I think so.

19 Q. Ms. Robinson bought vacuums for your  
 20 home; didn't she?

21 A. Yes.

22 Q. Ms. Robinson reminded you to speak  
 23 with your children; didn't she?

24 A. No, she didn't remind me to speak  
 25 with my children. She was trying to do some of

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1 that and my children resented her doing that.  
 2 Trying to, you know.

3 Q. You had Ms. Robinson coordinate your  
 4 schedule so that you could spend time with your  
 5 children over spring break; didn't you?

6 A. Yes, she coordinated all of that  
 7 stuff, yes.

8 Q. You had Ms. Robinson assist with  
 9 various items related to your former partner  
 10 Toukie Smith, didn't you?

11 A. Say that again.

12 Q. You had Ms. Robinson assist with  
 13 various things related to your former partner?

14 A. There was a point that she did that  
 15 briefly and that was it.

16 Q. What point was that?

17 A. Somewhere a couple years ago where  
 18 she was -- I asked her and Robin to do  
 19 something, but it didn't go very long.

20 Q. What did you ask Ms. Robinson to do  
 21 with respect to --

22 A. To help her with certain things.  
 23 Just it didn't --

24 Q. And this was about 2018, 2019,  
 25 correct?

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1 A. Yes, around there, yes.

2 Q. And do you remember what you asked  
 3 Ms. Robinson to do with respect to Toukie Smith?

4 A. To help her out with certain things.  
 5 There was a nurse involved in getting and so on  
 6 and make sure she was okay.

7 Q. And who is Toukie Smith?

8 A. She is the mother of my twins.

9 Q. And, specifically, what did you ask  
 10 Ms. Robinson to do?

11 A. I don't remember specifically other  
 12 than to help out with Toukie and what she needed  
 13 with whatever it was at that time. I'm  
 14 forgetting.

15 Q. You asked Ms. Robinson to assist  
 16 with your divorce; didn't you?

17 A. In what way?

18 Q. Any way that you can remember.

19 A. No, she didn't assist in my divorce  
 20 other than helping me find a place. You know,  
 21 that was the townhouse.

22 Q. Do you remember if Ms. Robinson  
 23 pulled text messages and e-mails from Grace  
 24 Hightower?

25 A. She pulled what she could have, yes.

42 (Pages 162 to 165)

1 Q. And that assisted you in your  
2 divorce; didn't it?

3 A. I guess if it was related to that,  
4 yes.

5 Q. And she reviewed Black Amex card  
6 statements regarding charges concerning your  
7 kids; didn't she?

8 A. I don't remember. She could have.

9 Q. She basically collected evidence for  
10 you to use in your divorce proceedings, isn't  
11 that right?

12 A. She could have.

13 Q. When you say she could have, do you  
14 mean "yes"?

15 A. I'm saying she could have. I don't  
16 remember a hundred percent.

17 Q. Well, you would have no reason to  
18 say that Ms. Robinson is lying under oath if she  
19 testified to that?

20 A. Well, I think some things she's  
21 not -- she's delusional. So what can I say?  
22 There were things that she did pull. I just,  
23 I'm worried because when I say one thing and  
24 then it is made into a positive there's a  
25 condition somewhere in the middle there. So I

1 say she could have. So that's it.

2 Q. Well, you don't dispute that Ms.

3 Robinson collected evidence to help you in your  
4 divorce, right?

5 A. Yes, I think she did. I'll say that  
6 like that.

7 Q. All right.

8 You asked Ms. Robinson to  
9 communicate with your divorce attorney; didn't  
10 you?

11 A. I might have.

12 Q. Is that a "yes"?

13 A. That's all I can say, is I might  
14 have. You have the e-mails, so you have them.  
15 So you know.

16 Q. On two occasions you asked Ms.  
17 Robinson to accompany you to the emergency room,  
18 didn't you?

19 A. Yes.

20 Q. Ms. Robinson on several occasions  
21 accompanied you to doctors; didn't she?

22 A. Yes. I went to the emergency room  
23 and maybe another doctor. I can't remember  
24 specifically, yes.

25 Q. So a significant part of Ms.

1 Robinson's work for you at Canal involved  
2 assisting you with your personal life; fair to  
3 say?

4 A. Yes.

5 MR. DROGIN: Objection to the  
6 form.

7 You can answer.

8 BY MR. SANFORD:

9 Q. What's the answer, sir?

10 A. Yes.

11 Q. Okay.

12 Ms. Robinson would create a list and  
13 research your supplements for you; didn't she?

14 A. I don't know if she did that. I had  
15 some supplements. She wouldn't research them.  
16 She would get what I asked her to get me.

17 Q. Ms. Robinson would help you  
18 understand the instructions before your  
19 [REDACTED] didn't she?

20 A. No, no, no. She might have -- no.

21 Q. She might have what?

22 A. Nothing. I know what the  
23 instructions are. She might have read them once  
24 and now all the sudden she's helping me with  
25 instructions for my [REDACTED]. No, I did that

1 many times. I knew how to do it. I knew what  
2 the procedure was.

3 Q. Ms. Robinson filled out medical  
4 forms for you; didn't she?

5 A. She might have.

6 Q. Ms. Robinson was listed as your  
7 emergency contact on medical forms; wasn't she?

8 A. Might have been if I thought she was  
9 the fastest person to get because then she would  
10 know who to get.

11 Q. When you say might have been, you're  
12 saying "yes"?

13 A. Yes, that I'm saying "yes".

14 Q. Ms. Robinson would tour some of the  
15 potential apartment rentals with you in person;  
16 wouldn't she?

17 A. Yes.

18 Q. Ms. Robinson would tour some of the  
19 potential apartment rentals with you on  
20 FaceTime; wouldn't she?

21 A. Yes.

22 Q. Ms. Robinson would put the utility  
23 accounts for the townhouse under her name if she  
24 was unable to list them under a company name;  
25 isn't that right?

1 A. She might have, yes.

2 Q. Ms. Robinson used her cell phone  
3 number as the emergency contact for your ADT  
4 system at your townhouse; didn't she?

5 A. She might have. And there was  
6 something about she did that instead of giving  
7 it to us or giving it to Tiffany. She was,  
8 again, possessive my understanding was about  
9 that.

10 Q. Ms. Robinson, in fact, gave you the  
11 information regarding the ADT system; didn't she  
12 or do you not remember?

13 A. I'm not sure. She might have given  
14 it to me or Tiffany.

15 Q. You told Ms. Robinson that working  
16 on the design and townhouse project was a good  
17 skill for Ms. Robinson to have; didn't you?

18 A. I don't know if I said that. And if  
19 I did so what? What does that mean?

20 Q. You asked Ms. Robinson to buy  
21 interior design magazines and go over ideas with  
22 you for the townhouse; didn't you?

23 A. I could have, yes.

24 Q. You asked Ms. Robinson to organize  
25 your suits and shirts for you; didn't you?

1 A. I don't know if I did that. She did  
2 the closet. So when I had stuff, I asked her to  
3 put it in the closet.

4 Q. Well, she helped you unpack when you  
5 moved in to [REDACTED] right?

6 A. That's what she does. That's what  
7 she was supposed to do, yes. I mean, help me or  
8 get somebody else to do it or she would, you  
9 know, do it.

10 Q. You asked Ms. Robinson to go --

11 A. I don't, you know this is all crazy,  
12 yes, okay.

13 Q. You asked Ms. Robinson to go to the  
14 Decoration and Design and New York Design  
15 Center, otherwise known as the D&D Building?

16 A. Yes.

17 Q. Sorry, Mr. De Niro, I need to finish  
18 --

19 A. Rachel. The person she found, her  
20 friend.

21 Q. I just have to finish my question so  
22 we have a record.

23 A. Okay.

24 Q. You asked Ms. Robinson to go to the  
25 Decoration and Design and New York Design Center

1 otherwise known as the D&D Building with you;  
2 didn't you?

3 A. Yes.

4 Q. You looked at furnishings with Ms.  
5 Robinson at those buildings, right?

6 A. Yes.

7 Q. And you looked at furnishings at  
8 other outlets like Restoration Hardware, right?

9 A. Yes.

10 Q. And Ms. Robinson helped plan and  
11 design room layouts in your townhouse, correct?

12 A. She helped with that, yes, to some  
13 degree.

14 Q. And she helped pick out paint colors  
15 for your townhouse; didn't she?

16 A. Yes.

17 Q. And Ms. Robinson helped you picked  
18 out fabric options for your townhouse; didn't  
19 she?

20 A. Yes.

21 Q. Ms. Robinson picked out a Christmas  
22 tree for your townhouse in 2018; didn't she?

23 A. She did.

24 Q. Ms. Robinson went to art stores and  
25 picked out art from your father for your

1 townhouse in 2018 and 2019; didn't she?

2 A. She could have, yes.

3 Q. Ms. Robinson helped coordinate in  
4 2018 childproofing for your townhouse windows,  
5 didn't she?

6 A. Yes.

7 Q. Ms. Robinson would display purchases  
8 for the townhouse like blankets and lamps for  
9 you to confirm what you liked or did not like,  
10 correct?

11 A. Yes.

12 Q. Ms. Robinson designed and put an  
13 anniversary photo album together as a gift for  
14 your former wife Grace De Niro, correct?

15 A. Uh-hum. Yes.

16 Q. And she put together -- Ms. Robinson  
17 put together photo albums for your children's  
18 big birthdays, right?

19 A. Yes.

20 Q. Ms. Robinson met you at Blue Tree to  
21 shop for gifts?

22 A. Yes.

23 Q. Ms. Robinson met you at the MoMA  
24 store to shop for holiday gifts?

25 A. She had a couple times, yes.



1 Q. Ms. Robinson met you at the Neue  
2 Galerie to shop for gifts?

3 A. Yes.

4 Q. Ms. Robinson made a photo card for  
5 your former wife for Valentine's Day?

6 A. She, she was very good at making  
7 those cards.

8 Q. Is that a "yes"?

9 A. That's a "yes".

10 Q. You had Ms. Robinson help your  
11 former wife with decorating and planning Lucy  
12 Damon's baby shower?

13 A. I don't know. She might have. I  
14 don't, I don't know.

15 Q. You had Ms. Robinson help your  
16 former wife schedule appointments for your  
17 daughter's Helen's school search?

18 A. Could be. Yes.

19 Q. You had Ms. Robinson speak to your  
20 former wife about the research she did for your  
21 son Elliot's school search?

22 A. Say that again.

23 Q. You had Ms. Robinson speak to your  
24 former wife about the research Ms. Robinson did  
25 for your son Elliot's school search?

1 A. I'm sorry, just repeat that one more  
2 time. I don't know why.

3 Q. Sure.

4 You had Ms. Robinson speak to your  
5 former wife about the research she did relating  
6 to Elliot's school search?

7 A. Okay. I could have, yes.

8 Q. And you had Ms. Robinson assist your  
9 former wife with whatever your former wife  
10 needed, correct?

11 MR. DROGIN: Objection to the  
12 form.

13 You can answer it.

14 BY MR. SANFORD:

15 Q. Is that a "yes"?

16 A. What's the question again, sorry?

17 Q. You had Ms. Robinson assist your  
18 former wife with whatever she needed?

19 MR. DROGIN: Objection to the  
20 form.

21 A. Yes, that's too general.

22 BY MR. SANFORD:

23 Q. You had Ms. Robinson speak to your  
24 current girlfriend Tiffany Chen and coordinate  
25 what time she could come to your townhouse in

1 order to avoid detection by others, correct?

2 A. No, no.

3 Q. That never happened?

4 A. No, I don't know what the point of  
5 that question is either.

6 Q. You asked Ms. Robinson to find  
7 Tiffany Chen medical insurance; didn't you?

8 A. I could have.

9 Q. You had Ms. Robinson assist Tiffany  
10 Chen what with whatever Ms. Chen needed; didn't  
11 you?

12 MR. DROGIN: Objection to the  
13 form.

14 A. I could have.

15 BY MR. SANFORD:

16 Q. I'm sorry, the answer is?

17 A. Probably I could have, yes.

18 Q. You asked Ms. Robinson to review  
19 your son Julian's [REDACTED] when he was  
20 about 16 years old; didn't you?

21 A. I don't know if I would have asked  
22 her to review his [REDACTED]

23 Q. You might have, you just don't  
24 remember?

25 A. Huh?

1 Q. You might have, you just don't  
2 remember?

3 A. I don't remember. I don't know if I  
4 would have done that.

5 Q. You had Ms. Robinson meet with your  
6 son [REDACTED] to check in with him to help  
7 him in various ways, correct?

8 A. I can't remember, but I might have.

9 Q. You had Ms. Robinson coordinate with  
10 your son [REDACTED] and your son [REDACTED] support  
11 staff, right?

12 A. Yes, and that's where it didn't go  
13 quite right. So it happened, but it didn't  
14 happen for long.

15 Q. You asked Ms. Robinson to have your  
16 grandson [REDACTED] intern for Ms. Robinson,  
17 correct?

18 A. I might have at one point. I don't  
19 remember. I might have.

20 Q. And when [REDACTED] worked as an intern, he  
21 would typically take an Uber from the office,  
22 correct?

23 A. That, I don't know.

24 MR. DROGIN: Objection to the  
25 form.



1 A. That I don't know and she should  
 2 have stopped him if he did.  
 3 BY MR. SANFORD:  
 4 Q. Why should she have stopped him?  
 5 A. Because she should have stopped him  
 6 or she should have told me about it because I  
 7 would have said take the subway. He's a kid.  
 8 Q. Kids should take subways and not  
 9 Ubers?  
 10 A. Come on. Don't be a -- give me a  
 11 break.  
 12 Q. Well, I'm asking you a question.  
 13 A. I'm saying they take the subway,  
 14 yes. Certain kids at a certain age take the  
 15 subway or they jump in a cab. Unless there's a  
 16 specific reason for taking an Uber where you  
 17 want them to be in that kind of situation, but  
 18 otherwise, no.  
 19 Q. Don't you think Ubers are safer than  
 20 subways?  
 21 MR. BENNETT: Objection.  
 22 A. Yes, but he is a New York kid and he  
 23 has to learn to travel on the subways. That's  
 24 normal.  
 25

1 BY MR. SANFORD:  
 2 Q. But you do agree Ubers are safer  
 3 than subways?  
 4 A. I do too, but they cost a little  
 5 bit. And kids have to learn if you take the  
 6 subway that's the fastest mode of transportation  
 7 through the city.  
 8 Q. You asked Ms. Robinson to research  
 9 land easements for your [REDACTED] property;  
 10 didn't you?  
 11 A. I don't remember that.  
 12 Q. You wanted to save money by  
 13 designating your property as a land easement and  
 14 she did some research with respect to that;  
 15 didn't she?  
 16 A. I don't remember that.  
 17 Q. You asked Ms. Robinson to go to your  
 18 Montauk house to assess what you should keep  
 19 prior to the house being demolished; didn't you?  
 20 A. I could have.  
 21 Q. Is that a "yes"?  
 22 A. I don't know. I can't remember.  
 23 Q. All right.  
 24 MR. SANFORD: Let's go off the  
 25 record for five minutes, please.

1 THE VIDEOGRAPHER: The time is  
 2 12:58. We are going off the record.  
 3 (Whereupon, at 12:58 o'clock  
 4 p.m., a recess was taken until 1:20  
 5 o'clock p.m.)  
 6 THE VIDEOGRAPHER: The time is  
 7 1:20. We are back on the record.  
 8 BY MR. SANFORD:  
 9 Q. Mr. De Niro, you understand you're  
 10 still under oath?  
 11 A. Uh-hum. Yes. Yes.  
 12 Q. Okay. All right.  
 13 MR. SANFORD: We're sharing a  
 14 document with you in the chat that is  
 15 Bates stamped CANAL 46685 to 46686. A  
 16 two-page document and we're going to  
 17 mark this as Exhibit 115.  
 18 (Two-page document bearing  
 19 Bates stamp Nos. CANAL 46685 through  
 20 46686 was marked as Plaintiff's  
 21 Exhibit 118 for identification, as  
 22 of this date.)  
 23 MR. DROGIN: 115, did you say?  
 24 MR. SANFORD: Yes.  
 25 MR. DROGIN: I think you already

1 marked 46031 to 32 as 115.  
 2 MR. SANFORD: Well, if that's the  
 3 case, we'll mark this as 116.  
 4 MR. DROGIN: You marked 46038 as  
 5 116.  
 6 MR. SANFORD: All right.  
 7 Well, whoever is keeping track of  
 8 the documents, what are we on here?  
 9 MR. DROGIN: If you do 118, that  
 10 will work.  
 11 MR. SANFORD: Let's do 118.  
 12 See how cooperative we can be,  
 13 Laurent?  
 14 MR. BENNETT: I don't see the  
 15 document.  
 16 MR. DROGIN: Listen, this is the  
 17 first deposition that my dog hasn't  
 18 barked.  
 19 All right.  
 20 MR. SANFORD: That is a good  
 21 thing. And my daughter is not here. I  
 22 have an eight-year old daughter who is  
 23 usually on when I'm critical points she  
 24 always shows up.  
 25 MR. DROGIN: She doesn't bark.

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1 MR. SANFORD: She doesn't bark.  
2 I have a dog too, but she doesn't bark.  
3 My daughter on the other hand, she talks  
4 a lot.

5 MR. DROGIN: It gets very  
6 expensive on the transcript when the dog  
7 barks and the court reporter writes it  
8 down, dog barking.

9 Does everybody have the document?

10 MR. SANFORD: All right.

11 Does everyone have it up, 118?

12 Thank you for that correction.

13 MR. DROGIN: Yes.

14 BY MR. SANFORD:

15 Q. So, Mr. De Niro, you have what has  
16 been marked as CANAL 46685, 46686. It is an  
17 e-mail exchange, April 2, 2019 between Tiffany  
18 Chen and you.

19 Do you see that?

20 A. No, let me look for it. How do I  
21 pull? Oh, view. Okay. Let me see. No, I  
22 don't know how to -- oh, share screen. No, not  
23 that.

24 What is it?

25 MR. DROGIN: In the chat.

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1 THE WITNESS: Chat. Sorry. I  
2 went to the wrong thing. I see.

3 Okay.

4 MR. SANFORD: Let's go off the  
5 record while Mr. De Niro has an  
6 opportunity to review the document so we  
7 don't waste time.

8 THE VIDEOGRAPHER: The time is  
9 1:23. We are going off the record.

10 (Whereupon, at 1:23 o'clock  
11 p.m., a recess was taken until 1:24  
12 o'clock p.m.)

13 THE VIDEOGRAPHER: Counsel the  
14 time is 1:24. We are back on record.

15 BY MR. SANFORD:

16 Q. Mr. De Niro, did you have an  
17 opportunity to review what has been marked as  
18 document 118, the April 2nd e-mail, 2019?

19 A. Yes.

20 Q. Okay.

21 So what is that document, first of  
22 all?

23 A. What is it?

24 Q. Yes.

25 What did you just read?

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1 A. It is an e-mail.

2 Q. All right.

3 And it is an e-mail between?

4 A. Me and Tiffany.

5 Q. Okay.

6 And what was your reaction when you  
7 received the e-mail?

8 A. Well, I was upset because I didn't  
9 want to have to go, have to be dealing with this  
10 kind of thing. And I was -- you know, just a  
11 hassle. And I know that Tiffany was bending  
12 over backwards to try and be nice to Chase. And  
13 I think Chase, you know, she can pull that stuff  
14 with me. And I would say let it go. This and  
15 that. You know, I don't have time for it.  
16 Blah, blah, blah.

17 But when she did it to Tiffany, then  
18 you know, she's creating a problem. Trying to  
19 do something that she just shouldn't do. And I  
20 was trying to still fix it.

21 Q. Well, when you say you were dealing,  
22 you were upset dealing with this kind of thing,  
23 what kind of thing was it?

24 What do you mean by that?

25 A. Well, she wasn't, she wasn't --

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1 Chase is supposed to -- she was threatened by  
2 her obviously. And she was not being  
3 respectful. I know Tiffany. She is very  
4 respectful and tries to be nice. And was  
5 bending over backwards. But with Chase it was,  
6 just, it was -- she wasn't helping the  
7 situation.

8 Q. So you agree with Ms. Robinson's  
9 statement that her presence in the house was not  
10 working for Tiffany and, therefore you, right?

11 MR. BENNETT: Objection.

12 A. Well, at this point, especially if  
13 she was listening, reading all my e-mails  
14 because she cloned my phone, it is even more,  
15 more obscene and egregious. It is just -- I  
16 don't even know where to begin when I hear that.  
17 So...

18 BY MR. SANFORD:

19 Q. What do you mean by that? I don't  
20 understand.

21 A. You know what I mean by it. She,  
22 she, Chase had been aware of all these exchanges  
23 and so she is just acting like a spy. She is  
24 just acting on what she knows. It is unethical  
25 what she did to say the least. And, you know --

47 (Pages 182 to 185)

1 Q. What is unethical?

2 A. What do you mean what is unethical?  
3 Unethical is what she did. Cloned my phone and  
4 read my e-mails and read my exchanges.

5 Q. So you agree with Ms. Robinson's  
6 statement that Ms. Robinson's presence in the  
7 house was not working for Tiffany and, therefore  
8 you?

9 MR. BENNETT: Objection.

10 A. No. I don't know how it would have  
11 been if she hadn't read the exchanges. She  
12 might have had another thing. Is there anything  
13 that I have done. I don't know what she would  
14 have said. And then maybe there could have  
15 been. But she was starting to behave in a way  
16 that was not good. And I still was trying to  
17 make this all work, though.

18 BY MR. SANFORD:

19 Q. When Tiffany responds by saying, and  
20 I quote "This shit really pisses me off," what  
21 was she referring to, do you know?

22 A. The disrespect that Chase was, was  
23 doing.

24 Q. And the disrespect was what exactly?

25 A. She just wasn't responding to

1 anything that Tiffany would want. I don't know.  
2 Tiffany told you in her deposition I'm sure  
3 about the things that Chase had done. And so,  
4 you know, she told you what she had done, better  
5 than I can.

6 Q. What did Ms. Robinson say in the  
7 e-mail that was disrespectful, do you know?

8 MR. BENNETT: Objection to the  
9 form.

10 A. Well, there's nothing speculative in  
11 the e-mail. It is all very rationale and  
12 reasonable. But it is what she does in ways  
13 that are counter to the way she should behave  
14 with Tiffany and even me in some instances.

15 You know, I don't know what  
16 transference that she had about that I'm her  
17 father, her mother, her mother, her father, who  
18 the hell knows. Or her husband to be. Whatever  
19 it is, it has nothing -- the job is to be done  
20 the way her person Rachel did the job. The way  
21 I thought Lulu did the job. The way Sabrina did  
22 the job.

23 This was not her -- she was acting  
24 entitled. She was doing things that were not  
25 really right. Not helping the situation.

1 BY MR. SANFORD:

2 Q. So, there's -- Ms. Chen writes in  
3 part that, you know, what is happening here is  
4 manipulative and nasty.

5 What do you understand to be  
6 manipulative?

7 A. Just, it is just what she was doing.  
8 She was not responding. I think you have a  
9 better answer. I was not aware of this stuff  
10 and the minutia of it and so on. I just don't  
11 even remember. She just was not in general, not  
12 doing what was right, Chase.

13 Q. What was nasty?

14 A. I don't know. Tiffany told you. I  
15 don't remember. She told you. I know you have  
16 all these answers. So you have it.

17 Q. Did you ever tell Ms. Chen not to  
18 refer to Ms. Robinson as a bitch?

19 A. No. I didn't say anything.

20 Q. When you saw this in an e-mail and  
21 I'm quoting here "This bitch needs to get put in  
22 her fucking place," how did you react?

23 A. I saw that she was upset, you know.

24 Q. Did you ever, did you ever  
25 communicate with Ms. Chen about being respectful

1 towards Ms. Robinson?

2 MR. BENNETT: Objection.

3 A. Mr. Chen didn't have to. She told  
4 me how disrespectful she was. And everybody  
5 knew that. Chase had a reputation among not  
6 just with the way she treated Tiffany, but the  
7 way she treated everybody. They all hated her.  
8 She thought she was being nice or take them to  
9 dinner on my dime at Nobu. I said fine. And  
10 stuff like that. But she was -- they hated her.  
11 They all rejoiced when she left. I had no idea  
12 that this was all going on.

13 BY MR. SANFORD:

14 Q. Well, when you read Ms. Chen's  
15 e-mail to you when she writes "This bitch needs  
16 to get put in her fucking place," did you agree  
17 with that?

18 A. No, no, I'm just listening. I'm  
19 just saying "Oh, here we go". Now I've got to  
20 see what I'm going to talk to Chase. I don't  
21 know. I might have said something to Chase.  
22 Maybe and maybe she should stay away from the  
23 house and I think that's what we finally agreed  
24 to.

25 Q. Do you think Ms. Chen was jealous of

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1 Ms. Robinson?

2 A. No.

3 MR. DROGIN: Objection to the  
4 form.

5 A. No, she wasn't.

6 BY MR. SANFORD:

7 Q. You don't think she was ever jealous  
8 of Ms. Robinson?

9 A. No.

10 Q. You don't think that she felt that  
11 Ms. Robinson had a place in your life that she,  
12 Ms. Chen wanted to have in your life?

13 MR. DROGIN: Objection to the  
14 form.

15 A. No. You mean that Ms. Robinson was  
16 jealous?

17 BY MR. SANFORD:

18 Q. No.

19 That Ms. Chen was jealous of Ms.  
20 Robinson's intimate place in your life?

21 A. No, no, she wasn't jealous. She was  
22 angry and annoyed because she wasn't being  
23 treated properly by somebody who worked for me.  
24 And I guess she is saying here, you know, I'll  
25 be able to finish the job and she'll go off and

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1 it helps her to go off to some other country,  
2 some other city and I'll still be paying her.

3 I mean, it is all, in hindsight I  
4 guess she should have just said look, I think it  
5 is time for me to leave. And she also had the  
6 actual e-mails because she cloned my phone,  
7 which in itself is just, that in itself is a  
8 sin, just beyond.

9 I never -- you just don't do that.

10 And maybe her reaction would have been different  
11 if she just was acting off the vibe she was  
12 getting from Tiffany, but Tiffany was trying to  
13 be nice to her. But, you know, you have to --  
14 at some point if somebody is being nasty and  
15 snappy and snippety and petulant and a brat,  
16 yes, I mean, she could do that with me because I  
17 didn't pay attention to her.

18 But you can't do it to my  
19 girlfriend. You can't do it. You can't do it  
20 to my children. You can't do it. You can't be  
21 dismissive. You can't do it. And she --

22 Q. You keep referring to your phone as  
23 being cloned. Your phone was cloned to assist  
24 you in compiling evidence for your divorce,  
25 right?

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1 A. No, I'm not understanding it like  
2 that. And if it was cloned to assist me in  
3 evidence -- I don't think so. This was after.  
4 Somehow that doesn't make sense. I don't have  
5 my -- can my attorneys jump in on this?

6 Q. Your attorneys can't testify for  
7 you. I'm just asking you factually what you  
8 understand to be the case.

9 Is it your understanding that your  
10 clone -- your phone wasn't cloned in order to  
11 assist you in your divorce?

12 A. I don't remember that I would let  
13 her clone my phone to assist in my divorce. Not  
14 going forward. From the past, yes. Maybe, but  
15 not going forward.

16 Q. Well, what do you understand to be a  
17 clone of your phone? You're talking about a  
18 backup?

19 A. I understand that she has e-mails of  
20 mine that she shouldn't have been privy to.  
21 Period. It is none of her business. I might  
22 have said clone in the back, to go back to stuff  
23 because of the historical stuff that we had  
24 between my wife and myself and I forget even  
25 what the reason for that would have been, but

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1 definitely not going forward.

2 Q. The clone of your phone was a backup  
3 of your phone. It wasn't something that Ms.  
4 Robinson could use to spy on your e-mails going  
5 forward, it was a backup?

6 A. Didn't she?

7 Q. It was a backup to assist you?

8 A. No, no, no, don't twist it around.  
9 She did it, she did it for that reason, but she  
10 also had access to other stuff going on up to  
11 and currently and going forward, which I didn't  
12 realize.

13 Q. All right.

14 MR. SANFORD: We are sharing a  
15 document with you in the chat that's  
16 Bates stamped ROBINSON 1602. Oh, wait a  
17 second, hold on, yes, 1602, which is an  
18 e-mail from Ms. Robinson to you on April  
19 4, 2019.

20 We're going to share that and  
21 we'll go off the record while you have  
22 an opportunity to read it.

23 THE VIDEOGRAPHER: The time is  
24 1:36. We are going off the record.  
25 (Whereupon, at 1:36 o'clock

49 (Pages 190 to 193)

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1 p.m., a recess was taken until 1:37  
 2 o'clock p.m.)  
 3 THE VIDEOGRAPHER: The time is  
 4 1:37 and we are back on record.  
 5 BY MR. SANFORD:  
 6 Q. Okay.  
 7 So you have before you, Mr. De Niro,  
 8 1602, which we can identify as 119, is that  
 9 right.  
 10 MR. SANFORD: Is that where we  
 11 are, Exhibit 119?  
 12 (Document bearing Bates  
 13 stamp Nos. ROBINSON 1602 was marked  
 14 as Plaintiff's Exhibit 119 for  
 15 identification, as of this date.)  
 16 BY MR. SANFORD:  
 17 Q. Have you had a chance to review this  
 18 document?  
 19 A. Yes. I see it.  
 20 Q. All right.  
 21 What is it?  
 22 A. Yes, I don't --  
 23 Q. What is the document?  
 24 A. It is the one from Chase Robinson  
 25 saying I worked for you for 11 years. Bent over

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1 backwards.  
 2 Q. What was your reaction, what was  
 3 your reaction?  
 4 A. I don't know what I did in reaction  
 5 to this. I don't remember. I think two days  
 6 later she quit. I don't know what I answered.  
 7 Q. Well, do you recall clarifying Ms.  
 8 Robinson's responsibilities in January of 2019?  
 9 A. I recall that she, her  
 10 responsibilities -- I don't even remember what  
 11 we clarified other than what she was doing  
 12 already.  
 13 Q. Do you know what Ms. Robinson is  
 14 referring to when she refers to unfounded and  
 15 untrue accusations regarding missing pots and  
 16 pans and missing from Kraft catering?  
 17 A. Well, so says she. But then she  
 18 just returned to me two months ago or something,  
 19 a bunch of stuff without even apologizing or  
 20 saying I did have this. I'm sorry. Stuff that  
 21 she kept. She has not returned my air miles.  
 22 She has returned the stuff, as I say, without an  
 23 apology.  
 24 She still owes me the air miles. I  
 25 did not give her -- I gave her so much air miles

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1 just for her to use appropriately in relation to  
 2 her work. Not to take millions of air miles.  
 3 So, I don't even know. With her, even something  
 4 like this is suspect because knowing that she  
 5 also was privy to my e-mail exchanges, she's --  
 6 I don't know, it is like weird.  
 7 I don't trust her anymore. I mean,  
 8 I trusted her to do everything. And now she is  
 9 just playing games and setting me up to do what  
 10 she's doing right now.  
 11 Q. How is she setting you up?  
 12 A. You know how she is doing it. She  
 13 is setting up to do this. And then, you know,  
 14 you guys are showing me this e-mail. She had it  
 15 planned and set up in some way to do what she's  
 16 doing now because she also might have felt that  
 17 her time was limited. It was not, in fact,  
 18 limited. I didn't do anything. But she felt,  
 19 you know, this is going to be a problem maybe  
 20 and so she started doing -- and then finally  
 21 sent me that resignation two days later.  
 22 Q. Did you ever meet with Ms. Robinson  
 23 after receiving her e-mail of April 4, 2019?  
 24 A. I don't remember. I don't remember  
 25 if we talked or whatever.

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1 Q. Did you ever offer Ms. Robinson a  
 2 meeting after receiving her e-mail of April 4,  
 3 2019?  
 4 A. I don't remember.  
 5 Q. Did you ever offer Ms. Robinson any  
 6 options to address the concerns she was  
 7 expressing before she resigned from Canal?  
 8 MR. DROGIN: Objection to the  
 9 form.  
 10 MR. BENNETT: Objection.  
 11 A. I don't remember.  
 12 MR. SANFORD: I'm sharing a  
 13 document with you in the chat. It is  
 14 Bates stamped CANAL 36475. And we're  
 15 going to go off the record giving you an  
 16 opportunity to review it. When you're  
 17 ready, let me know.  
 18 THE WITNESS: Okay.  
 19 THE VIDEOGRAPHER: The time is  
 20 1:41. We're going off the record.  
 21 (Whereupon, at 1:41 o'clock  
 22 p.m., a recess was taken until 1:42  
 23 o'clock p.m.)  
 24 THE VIDEOGRAPHER: The time is  
 25 1:42. We are back on record.

50 (Pages 194 to 197)



1 BY MR. SANFORD:

2 Q. Before, Mr. De Niro, we discuss that  
3 document, just one final question about what we  
4 were talking about a moment ago.

5 Sitting here today you don't recall  
6 doing anything to address the concerns  
7 referenced in Ms. Robinson's e-mail of April 4,  
8 2019, the e-mail you read before?

9 MR. DROGIN: Objection to the  
10 form.

11 You can answer.

12 A. I don't know. I don't know whether  
13 I was just so tired with all this that I just  
14 let it go. I don't -- yes, I don't know.

15 BY MR. SANFORD:

16 Q. All right.

17 A. No, I don't.

18 Q. That's fine.

19 Is that your testimony, I didn't  
20 mean to interrupt you.

21 A. No, no, that's it. I just, you  
22 know, I mean, my thought is that if, if Chase  
23 had the access to this, you know, she thinks she  
24 better act before, I don't know why. I don't  
25 know why, but, you know, that's all.

1 Q. All right.

2 You had a chance to review before we  
3 went off the record a document CANAL 36475,  
4 which has been identified as Exhibit 90.

5 Do you recognize that document?

6 A. Which is Exhibit 90? I don't know  
7 which that is.

8 Q. The last thing you were in. It is  
9 one-page document, it is an April 6, 2019 e-mail  
10 from Ms. Chen to Lulu White and cc'ing a bunch  
11 of people.

12 A. Right.

13 Q. All right.

14 So this is an e-mail from Tiffany  
15 Chen to Lulu White, cc'ing Jillian Spears,  
16 Sabrina Weeks-Britain and you, right?

17 A. Right.

18 Q. All right.

19 And the e-mail in part has Tiffany  
20 tell Lulu that, and I'm quoting here "Chase is  
21 no longer involved with anything regarding the  
22 townhouse or the twins. You are not to discuss  
23 anything with her that you discuss with us. Any  
24 e-mails between us are not to be shared with  
25 Chase".

1 Do you remember that e-mail?

2 A. Well, I don't know if I do actually.  
3 I'm not included in it. So...

4 Q. Well, you're copied on it, right?

5 A. I am copied. Okay.

6 MR. BENNETT: Objection.

7 A. I am.

8 BY MR. SANFORD:

9 Q. Being copied on it you are included  
10 on it, right?

11 MR. BENNETT: Objection.

12 A. I am included, yes.

13 Okay.

14 BY MR. SANFORD:

15 Q. All right.

16 But this is an e-mail from Tiffany  
17 directly to Lulu White.

18 Who is Lulu White?

19 A. She worked -- Chase brought her in.  
20 I don't know. We were trying to find her. I  
21 don't know where she is.

22 Q. What was her position?

23 A. Sorry?

24 Q. What was her role? What was her  
25 title?

1 A. I don't -- she was helping us  
2 with -- she had her help with the townhouse and  
3 brought her in. I don't know why she didn't  
4 have Sabrina or Jillian come into it. She had  
5 at one point Sabrina, but I don't know.

6 Q. Was Lulu White an employee at Canal?

7 A. Chase brought her in. I don't know  
8 what happened to her. We were trying to find  
9 her through all of this.

10 Q. Well, when you use phrases like  
11 "brought her in," I don't know what that means.

12 Do you know whether Lulu White was  
13 an employee at Canal?

14 A. I don't know that technically. For  
15 all I know, Chase brought her in to be loyal to  
16 her, I'm sure. And I obviously had to pay for  
17 it, but I don't know how it was done. This is  
18 something you should ask my lawyers or ask  
19 Berdon.

20 Q. All right.

21 Who is Jillian Spear?

22 A. Jillian worked for me too.

23 Q. As what?

24 A. She was in the same capacity as  
25 Sabrina.



1 Q. Which was what?  
 2 A. An assistant at the office.  
 3 Q. Assistant at Canal?  
 4 A. Yes.  
 5 Q. An assistant assisting whom?  
 6 A. Me, and you know, doing the work in  
 7 the office.  
 8 Q. And did you --  
 9 A. And she was being told what to do by  
 10 Chase.  
 11 Q. Had you reviewed the e-mail Ms. Chen  
 12 sent before she sent it, Exhibit 90, the one  
 13 page e-mail that you have in front of you?  
 14 A. Did I see it before?  
 15 Q. Yes.  
 16 A. I don't know if I did.  
 17 Q. Did you approve it in any way  
 18 orally?  
 19 Do you remember speaking with Ms.  
 20 Chen about it?  
 21 A. I don't know. I don't remember. I  
 22 really don't know. She put Bobby. Is that how  
 23 she is cc'ing me?  
 24 Q. Well, let me ask you this.  
 25 A. In other words, I'm not cc'd.

1 form.  
 2 That's not what the e-mail says.  
 3 A. Yes, I saw that there was, there was  
 4 this problem. And I saw that, just that's  
 5 probably the best way to handle it.  
 6 BY MR. SANFORD:  
 7 Q. You wanted Ms. Robinson fired;  
 8 didn't you?  
 9 A. No, I didn't want her fired. I  
 10 wasn't going to fire her.  
 11 Q. Well, what responsibilities was Ms.  
 12 Robinson to have?  
 13 A. She had the responsibilities at the  
 14 office. She left the house. That's Tiffany and  
 15 me and my domain. The other people who work and  
 16 do what we ask, there's no problem. If there's  
 17 a territorial thing with Chase, she can't be  
 18 there. I can't have it. There's plenty of  
 19 other things to do.  
 20 Q. Was there a territorial thing  
 21 between Ms. Chen and Ms. Robinson?  
 22 MR. DROGIN: Objection.  
 23 A. Well, all I know is that people --  
 24 there was, there was discord. And we were  
 25 trying to get the place done. And I know

1 Q. It says "Chase is no longer involved  
 2 with anything regarding the townhouse or the  
 3 twins"?  
 4 A. Right.  
 5 Q. Was that, was that your desire?  
 6 A. That could have been my agreement  
 7 with her, that that's it, yes. It could have  
 8 been.  
 9 Q. And were you not to discuss anything  
 10 with her, being Ms. Robinson, that you discussed  
 11 with us, was that your desire?  
 12 A. I could have said that. That would  
 13 have been the simplest way to handle it. She's  
 14 just not involved with the townhouse. It is too  
 15 complicated. We have other things to do.  
 16 Q. And "Any e-mails between us are not  
 17 to be shared with Chase," was that your desire?  
 18 A. I don't know whether I would say not  
 19 to be shared, but that's, that's fine. If it  
 20 wasn't, I don't know.  
 21 Q. So what prompted you to decide that  
 22 Ms. Robinson was not to be involved with  
 23 anything going forward?  
 24 MR. BENNETT: Objection.  
 25 MR. DROGIN: Objection to the

1 Tiffany, she doesn't care too much about the  
 2 stuff that I care about. So the little things  
 3 that she asked were not a lot. And Chase was  
 4 giving her a hard time about it. I needed this  
 5 like I needed a hole in the head. Chase is  
 6 supposed to be above that or just say "Okay,  
 7 what do you want? Or at worse, check with me,  
 8 at most she checked with me and say "Tiffany  
 9 said this. I just want to check, are you okay  
 10 with that?" That's all. It can't be, it can't  
 11 be this big tug of war, you know.  
 12 BY MR. SANFORD:  
 13 Q. Well, you were responsible for the  
 14 tug of war; weren't you?  
 15 A. What?  
 16 MR. DROGIN: Objection to the  
 17 form.  
 18 A. I was responsible for the tug of  
 19 war?  
 20 BY MR. SANFORD:  
 21 Q. Yes, you allowed it to happen?  
 22 A. That is a loaded question. What are  
 23 you doing? What are you doing? You've got to  
 24 be kidding me.  
 25 Q. You didn't allow it?

1 A. You've got to be kidding me.  
 2 Q. You didn't allow it to occur?  
 3 A. I allowed it to occur? Get out of  
 4 here. You ain't got your own domestic problems?  
 5 Get out of here. Don't be so -- don't be  
 6 idiotic. I mean, I'm just tired and excuse me  
 7 for being a little irate, but give me a break.  
 8 You've got to be kidding me.

9 You ask a question like that, I know  
 10 I'm going to get annoyed. You're right, I am  
 11 annoyed. Give me a break. You have discord in  
 12 your own household when somebody comes in and  
 13 creates problems or whatever or does this. That  
 14 sometimes -- there's no way around it. You have  
 15 to deal with it. You have to say "Okay, I have  
 16 to remove this person and put them over here".  
 17 I didn't fire them. There was no thought of  
 18 firing.

19 Q. And that's because you really valued  
 20 Ms. Robinson's work, didn't you?

21 A. I valued it in many ways and I just  
 22 was not even thinking of firing her. I was  
 23 getting annoyed with her, but I wasn't thinking  
 24 of firing her.

25 Q. Why did you value Ms. Robinson's

1 work in many ways, what ways did you value?

2 A. Well, she did good things in certain  
 3 ways and not good in others. She, she had this  
 4 emotional thing that was getting, you know,  
 5 getting in the way. So what can I do?

6 Q. Well, I know you focused a lot on  
 7 the negative, but I'm asking about the positive.

8 What were the good things that she  
 9 did, as you say, in certain ways?

10 A. Well, I would like to think they  
 11 were good things. I don't know after I had so  
 12 much -- such a strong reaction after she left  
 13 with the people who worked under her. I'm  
 14 feeling that maybe she wasn't so positive. She  
 15 always made it look like she was dying for me  
 16 and working so hard and 80, 90 hours a week and  
 17 this and that and this and that.

18 And I said "Okay, I take you at your  
 19 word. Okay, you're doing this and that. And I  
 20 believe you do this, you do that". But then I  
 21 also heard that she was delegating, relegating  
 22 -- delegating work to other people, you know,  
 23 even on the seventh floor who were -- I don't  
 24 know, I just thought she was doing it all. I  
 25 mean, it was a lot.

1 And she could have said at any time  
 2 "Listen, I can't do that. Can we give it to  
 3 Jillian or this person or that or Sabrina". I  
 4 think she was trying to control everything and  
 5 it was really hard.

6 Q. Can you think of any other good  
 7 things that Ms. Robinson did that you valued?

8 MR. DROGIN: Objection to the  
 9 form.

10 A. Well, she kept telling me all the  
 11 good things she did and all the hard work she  
 12 did. And she was available to me when I needed  
 13 or I told her I needed this and she did these  
 14 things. So, yes, I mean, she was good in many  
 15 ways. I can't think offhand, but she would do  
 16 what I asked her to do and I guess but a lot of  
 17 other people weren't feeling that way. And I  
 18 don't know. I don't know how she interacts at  
 19 the office. I know I don't want to get in this  
 20 situation ever again.

21 BY MR. SANFORD:

22 Q. Okay.

23 I'm sharing a document with you in  
 24 the chat.

25 A. I would like to make sure that

1 whoever works for me again has access to all my  
 2 documents all the time like Chase did because I  
 3 think that's an honorable thing that she did.  
 4 And, you know, it's just, I'm so -- I admire  
 5 that so much. She went in like a fucking spy  
 6 and took everything of mine and looked at it and  
 7 was privy to personal things in my life that I  
 8 just, I'm stunned by. And you guys represent  
 9 her. It is so nice of you. Maybe you'll make a  
 10 few points.

11 MR. DROGIN: What's the document  
 12 number?

13 THE WITNESS: You're asking me?

14 MR. DROGIN: No, sir. I'm asking  
 15 Mr. Sanford.

16 MR. SANFORD: Am I still frozen?

17 MR. DROGIN: No, you thawed.

18 MR. SANFORD: I'm back?

19 MR. DROGIN: Yes.

20 MR. SANFORD: All right.

21 BY MR. SANFORD:

22 Q. Mr. De Niro, we're sharing a  
 23 document with you in the chat that is Bates  
 24 stamped CANAL 46709 to 46710. A two-page  
 25 document, it is an April 6, 2019 e-mail between

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1 Tiffany Chen and you. Previously identified as  
2 93, Exhibit 93.

3 MR. SANFORD: We'll go off the  
4 record and give you an opportunity to  
5 review it and let me know when you're  
6 ready.

7 THE VIDEOGRAPHER: The time is  
8 1:55. We are going off the record.

9 (Whereupon, at 1:55 o'clock  
10 p.m., a recess was taken until 1:56  
11 o'clock p.m.)

12 THE VIDEOGRAPHER: The time is  
13 1:56. We are back on record.

14 BY MR. SANFORD:

15 Q. All right.

16 Mr. De Niro, you understand you're  
17 still under oath?

18 A. Yes.

19 Q. You've had an opportunity to review  
20 the April 6, 2019 e-mail between Ms. Chen and  
21 you, correct?

22 A. Yes.

23 Q. All right.

24 What is that document, what is that  
25 e-mail about?

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1 A. She says, again, I can't help  
2 thinking that she kind of knew our exchanges.  
3 So she wrote this. So, you know, what can I  
4 say? She is saying she quit. She resigned.

5 Q. Well, Ms. Chen writes that, and I'm  
6 quoting here "I think she knows what was coming  
7 and none of it was going to be in her favor".

8 What did Ms. Chen mean by that, do  
9 you think?

10 MR. DROGIN: Objection to the  
11 form.

12 MR. BENNETT: Objection.

13 A. Yes, you should ask her. I don't  
14 know what she meant, but she knew I wouldn't be  
15 happy with what Chase was doing. This whole  
16 situation that was created. The best thing is  
17 she should have just stayed in the office. We  
18 would have figured it out. She even could have  
19 gone to London and all that. And I did kind of  
20 resent that she is now going to London. I'm  
21 interrupting her trip. She's delayed her trip.  
22 Isn't that nice of her? To go to London that I  
23 paid for. God knows what she pays for. And she  
24 took more air miles as it was. I don't know if  
25 it was at this point, but she took them. And

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1 if she took them after, it is even worse because  
2 she had quit. So, now -- anyway, I'm just, what  
3 was I saying?

4 MR. BENNETT: You answered the  
5 question, Bob.

6 THE WITNESS: Yes, I answered the  
7 question.

8 BY MR. SANFORD:

9 Q. All right.

10 MR. SANFORD: I'm going to show  
11 you another document in the chat that's  
12 Bates stamped CANAL 47109 to 47111,  
13 which an April 6, 2019 e-mail exchange  
14 between Ms. Chen and you. And this is  
15 going to be Exhibit 120.

16 (Document bearing Bates  
17 stamp Nos. CANAL 47109 through  
18 47111, an April 6, 2019 e-mail  
19 exchange between Tiffany Chen and  
20 Robert De Niro was marked as  
21 Plaintiff's Exhibit 120 for  
22 identification, as of this date.)

23 MR. SANFORD: Let's go off the  
24 record while you have an opportunity to  
25 read that.

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1 THE VIDEOGRAPHER: The time is  
2 1:59. We are going off the record.

3 (Whereupon, at 1:59 o'clock  
4 p.m., a recess was taken until 1:59  
5 o'clock p.m.)

6 THE VIDEOGRAPHER: The time is  
7 1:59. We are back on record.

8 THE WITNESS: Yes. Hello?

9 MR. SANFORD: Okay.

10 Back on the record.

11 BY MR. SANFORD:

12 Q. You can hear me?

13 A. Yes.

14 Q. All right.

15 Sorry, Mr. De Niro, for the  
16 technical hiccup here.

17 You had an opportunity to review the  
18 April 6, 2019 e-mail --

19 A. Yes.

20 Q. -- between Ms. Chen and you, which  
21 is Exhibit 120, correct?

22 A. Yes.

23 Q. Yes?

24 A. Yes, I did.

25 Q. Okay.

54 (Pages 210 to 213)

1 And do you recognize the document?

2 A. Yes.

3 Q. What is it? What is that e-mail  
4 exchange about?

5 A. Well, it is about, you know, Chase  
6 sends her resignation. I forwarded it to Tom, I  
7 guess, and who else, Michael Hackett. I forget  
8 whoever it is here. And then Tiffany. And then  
9 she says, you know, what she says.

10 And I say "I know, but I'll do  
11 what's right". And that is what I would have  
12 done and what I have been trying to do, but I  
13 knew that Chase would do what she is doing  
14 exactly now. So here we are.

15 Q. What did you think was right when  
16 you said "I'll do what's right"?

17 A. Well, what was right is proper  
18 severance pay, giving me back the things that  
19 she took. Though, I'm not sure whether I knew  
20 at that time. I found out right after that that  
21 things were taken. And even then, give the  
22 things back. You're late or you're this or some  
23 lies here and there. I just would have said  
24 "Look, pay her the right thing". Not a  
25 shakedown, what she wanted \$600,000. Not a

1 letter to the London School of Economics because  
2 that's a shakedown and that letter could have  
3 been used in any way with a prospective  
4 employer. She knew that. That's why she  
5 composed it in that way. That is absolutely  
6 wrong. I could not, I could not go along with  
7 that.

8 Q. Well, I'm going to ask you about  
9 that in a second.

10 What did you think -- you said she  
11 was, she was asking for about 600,000 severance,  
12 what did you think the proper severance pay  
13 should have been?

14 A. It wasn't 600,000. And I never  
15 agreed to two years of that amount of money.

16 Q. What would it have been in your  
17 view, the amount of severance?

18 A. I don't know. We would have figured  
19 it out, but it would have been fair. I'm not  
20 going to -- I don't fuck around with that stuff,  
21 you know. I try to do what's right. But don't  
22 take advantage and don't do what is she's doing.  
23 That's not right. That's wrong.

24 Q. You don't think, you don't think an  
25 11-year employee making \$300,000 a year at that

1 point would have been --

2 A. No, I don't. No, I don't. Not with  
3 the egregious behavior that she has exhibited.  
4 Absolutely not. You know that.

5 Q. Mr. De Niro, I'm sorry, in order to  
6 have a record, I have to be able to finish my  
7 question.

8 My question, sir, is this: You  
9 didn't think that an employee who worked with  
10 you and for you for 11 years was entitled to two  
11 years of pay upon her departure, is that your  
12 testimony?

13 A. Absolutely. Not with what she had  
14 done, no. Especially in hindsight learning what  
15 she did. Absolutely not. That would be -- I  
16 mean, what she did is criminal and that's why I  
17 wanted my stuff back.

18 Q. You think one year of pay would have  
19 been a proper severance?

20 A. I'm not going to say. You know, I'm  
21 not going to say what it is. After what she put  
22 me through now, I don't know what will happen.

23 Q. But I'm asking you not now. I'm  
24 asking you at the time, you said you thought she  
25 deserved a proper severance package. May I

1 finish?

2 A. Yes, I can give you the answer. You  
3 don't have to waste your time questioning and  
4 lead up --

5 Q. Well, I do have --

6 A. -- and try to trap me. I'll give it  
7 to you straight.

8 Q. Mr. De Niro, I do have to waste my  
9 time and your words because I need a clean  
10 record.

11 A. You're making money and hoping to  
12 make a score off of this type of thing.  
13 Anyway...

14 Q. I understand you're --

15 A. Shame on you.

16 Q. I understand you're angry.

17 A. You're damn right I'm angry.

18 Q. All right.

19 I understand you're angry and I'm  
20 just trying to get a clean record despite you're  
21 angry.

22 My question, my question is: You  
23 wrote "I'll do what's right"?

24 A. Yes.

25 Q. What did you think was right?

1 A. I don't know. I would have found  
2 out. I would do right, what's right after  
3 talking to her. After we would negotiate. That  
4 she wouldn't pull nonsense that she did. To  
5 write a fake letter to take, steal my stuff,  
6 steal my mileage. Try to shake me down and say  
7 I want \$600,000. What could she expect? And  
8 then after learning the things that she did that  
9 she was privy to my e-mails. Come on.

10 Q. Well, did you ever think that it  
11 would be nice to sit down and talk with her  
12 about what's right?

13 A. I would have talked with her in time  
14 or I would have had her lawyer talk to my  
15 lawyer. But I would have -- we would have come  
16 to, we would have come to a -- but the more  
17 important thing about what she did -- and she  
18 did it to herself, is that when you do things  
19 like that to a person, you're hurting yourself.  
20 You don't play by the rules. You don't play by  
21 the law. Then you're going to, you're going to  
22 hurt yourself because I would have done -- I  
23 always trusted her. The honor system. Do what  
24 you've got to do. Take care of yourself when  
25 you go to London or Spain. Do what you need to

1 do when you go to California. Just do the right  
2 thing. Pride yourself on doing the right thing  
3 by me, to me and there would be no problem.

4 Q. You mentioned a letter to the London  
5 School of Economics.

6 Why were you unwilling to sign that  
7 letter?

8 A. Oh, come on. Come on. Look at that  
9 letter. Look at that letter. It is so easy for  
10 her to doctor it in a certain way and say -- and  
11 then I never know about. She would just give it  
12 to somebody else and say this is what he said  
13 about me. I couldn't do that. I can't in good  
14 conscious do that. She can't rely on me to just  
15 give her a recommendation. If I give one and  
16 she does what she did to me to them, they're  
17 going to come back at me. I can't do that.  
18 Under no circumstances. That's, that's wrong.

19 Q. Why didn't you write your own letter  
20 for her?

21 A. I don't know. At this point my  
22 letter might not -- I always like to talk to the  
23 prospective employer. I give the pros and cons  
24 of somebody who worked for me so they know. I  
25 don't write letters. I could have written a

1 letter. We didn't get to that point.

2 Q. You didn't offer it, did you?

3 A. No, we didn't get to the point of  
4 offering it. She said you owe me this. You  
5 give me this. You do this. There was a lot of  
6 contention.

7 Q. Why didn't you just tell her "Look,  
8 I'll write a letter. I can't write that one,  
9 but I'll write a different one"?

10 A. Because she had done other things.  
11 I don't know which came first, learning about  
12 the mileage, learning about the equipment that  
13 she finally returned and didn't say a thing  
14 about it. Just returned it. She stole from me.  
15 Period.

16 Q. We're going to talk about that. We  
17 have plenty of time to talk about that.

18 A. Plenty of time. You know, be my  
19 guest.

20 Q. But I'm wondering right now, I just  
21 want to get clear. You will refuse to sign the  
22 letter that she drafted and you never offered to  
23 write any letter or to give her a  
24 recommendation; isn't that true?

25 A. No, we didn't get to that point. We

1 didn't get to that point.

2 Q. Why didn't you get to point?

3 A. We just didn't. Sometimes those  
4 things take a little more time. I don't know.  
5 My lawyers found out that this was missing, that  
6 was missing. Air miles, dah, dah, dah. I said  
7 "Wait a minute, I knew there was going to be  
8 something with her". I knew it. I knew that  
9 this is the kind of person -- I suspected  
10 that -- I couldn't act on it. That wouldn't be  
11 proper. I just have to wait and see what comes  
12 and what I saw came was not good.

13 Q. Do you think there's a possibility  
14 that you may be mistaken about Ms. Robinson --

15 A. No, no.

16 Q. Mr. De Niro --

17 A. I don't think so.

18 Q. Mr. De Niro, may I finish? May I  
19 finish?

20 A. Go ahead.

21 Q. Thank you.

22 Is it possible that you may be  
23 mistaken about your view that Ms. Robinson stole  
24 from you?

25 A. You know, you're like the guy who



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1 gets caught cheating with his wife. His wife  
2 comes in -- with another woman. The wife comes  
3 in and he says "Did you believe me or your lying  
4 eyes"? Give me a break. Come on.

5 Q. So your answer is?

6 A. That's my answer.

7 Q. It is "yes" or "no", do you believe  
8 you may be mistaken?

9 A. No, I'm not mistaken. If I was  
10 mistaken I'm the first to say "Look, maybe I'm  
11 mistaken. I apologize. This and that. Let's  
12 meet somewhere in the middle". That's not the  
13 case.

14 Q. I understand you think you're right.  
15 I'm just asking you a different question.

16 A. No, I don't think I'm right.

17 Q. I'm not asking you whether you think  
18 you're right.

19 A. The facts say what it is. And you  
20 know it.

21 Q. Mr. De Niro --

22 A. You're the lawyer representing  
23 someone like her and that's your job. Go ahead.  
24 You know.

25 Q. Mr. De Niro, I'm not asking you

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1 whether you think you're right. I'm asking you  
2 whether is possible you may be mistaken?

3 A. No, it's not possible. I see what  
4 she did.

5 Q. It is not possible.

6 Are there any other Canal employees  
7 that you have refused to provide recommendations  
8 for?

9 A. Not that I know of.

10 Q. Are there any other Canal employees

11 --

12 A. I encourage employees who work for  
13 me to go get other jobs if it is better for them  
14 than the one they have with me. I encourage  
15 them. I will write a letter. I will talk to  
16 the people. Go, do it. I encourage that.  
17 There's no reason for anybody to stay with me if  
18 they have a better opportunity.

19 Q. Have you given recommendations to  
20 former Canal employees?

21 A. Some people, yes, I have. I mean,  
22 maybe you spoke to some of the former Canal  
23 employees or TriBeCa employees. You know,  
24 there's never a problem that I know of. She was  
25 trying to undermine everybody. Jane Rosenthal.

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1 Samuel Hern. Berdon. Everybody. She was  
2 trying to undermine everybody. Every situation.

3 Q. All right.

4 MR. SANFORD: We're sharing a  
5 document with you in the chat that is  
6 Bates stamped CANAL 49253 to 49254, an  
7 April 6, 2019 e-mail exchange between  
8 you and Ms. Robinson with Tom Harvey,  
9 Michael Tasch, John Hackett and Mark  
10 Bosswick copied. And this is going to  
11 be Exhibit 121, marked as 121.

12 Let's go off the record giving  
13 you an opportunity to take a look.

14 (Document bearing Bates  
15 stamp Nos. CANAL 49253 through 49254  
16 was marked as Plaintiff's Exhibit  
17 121 for identification, as of this  
18 date.)

19 THE VIDEOGRAPHER: The time is  
20 2:11. We're going off the record.

21 (Whereupon, at 2:11 o'clock  
22 p.m., a recess was taken until 2:13  
23 o'clock p.m.)

24 THE VIDEOGRAPHER: The time is  
25 2:13 and we are back on record.

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1 BY MR. SANFORD:

2 Q. Mr. De Niro, have you had an  
3 opportunity to review what's been marked as  
4 Exhibit 121?

5 A. Yes, I did.

6 Q. What is that Exhibit 121?

7 A. I did. Yes, I did.

8 Q. Okay.

9 And what is the document you  
10 reviewed?

11 A. It is the one where I say to Chase  
12 "That's fine. Certain things have to be  
13 finished out. I want as little as possible done  
14 by you. That certain things might just have to  
15 be resolved and only by you. You'll be let  
16 known what they are. Thanks, Bob".

17 She goes on with the e-mail she sent  
18 the other time.

19 Q. Okay.

20 And Ms. Robinson was never informed  
21 of what she needed to do to facilitate the  
22 transition; isn't that right?

23 A. Well, that only might have been  
24 because she started other things that put me on  
25 the defensive and I didn't know what to do and I

57 (Pages 222 to 225)



1 also, like as knowing that she had taken things  
2 like air miles and other things, things were  
3 missing. And now, this is something else. I  
4 was surprised, frankly, to hear that.

5 If anything, I thought she would  
6 just be honorable, correct. Do the right thing.  
7 None of this would -- disputes happen with  
8 people. That's okay. That's life. But to take  
9 because you think you're entitled to it. I gave  
10 you enough -- when we talked, I gave you, I said  
11 the 60 or 80 or 70,000 for the next few months  
12 after -- through the holidays to help me is one  
13 thing. I don't remember guaranteeing her two  
14 years for that. I just don't remember doing  
15 that. I wouldn't do that.

16 Q. As far as you know, no one at Canal  
17 ever reached out to Ms. Robinson to coordinate  
18 the logistics of the transition, right?

19 A. No, but I knew there was going to be  
20 legal problems. I did sense that and I told Tom  
21 "I have a feeling we're going to have a problem,  
22 but let's just see. Hopefully it works out  
23 nicely and there's no problem". I don't want to  
24 have problems. I don't want to go through all  
25 this.

1 materials to Canal, correct?

2 MR. BENNETT: Objection.

3 A. She knew how to reach out to the  
4 people and send it right back. She didn't need  
5 to know -- she knew who to get in touch with  
6 immediately. That should have been sent the  
7 next day. That was a Saturday I think she  
8 resigned. She should have sent it on Monday.  
9 BY MR. SANFORD:

10 Q. Mr. De Niro, let's, let's talk about  
11 your financial status.

12 How would you approximate your net  
13 worth in dollars?

14 A. I'm not telling you. It's none of  
15 your business.

16 Q. You're obligated to answer my  
17 question.

18 A. I'm sorry. Ask my lawyer. I don't  
19 know what to tell you. I'm not going to do  
20 that.

21 Q. You know --

22 A. I'm sorry, this is harassment. I'm  
23 sorry, you can't do this.

24 MR. SANFORD: Mr. Drogin, do you  
25 want to take a break with your client to

1 And the irony of it, if she had done  
2 the right thing, I'm the first person to say  
3 look, even if I disagree with this and that, I  
4 cannot -- I'm not going to penalize you. I'm  
5 not going to punish you. I'm not that kind  
6 of -- I don't do those things. I like to do the  
7 right thing. You do the right thing even if the  
8 other people don't do the right thing. You do  
9 the right thing. That's the way you deal with  
10 things. The way you handle it. That's my way.  
11 Period.

12 Q. As far as you know, no one at Canal  
13 ever reached out to Ms. Robinson to coordinate  
14 the logistics of returning the --

15 A. No, but we were getting into legal  
16 problems then. Excuse me, we were into, we were  
17 getting into legal problems, sir.

18 Q. Mr. De Niro, you're doing that thing  
19 again that you do.

20 A. What thing is that?

21 Q. Interrupting me.

22 A. I'm sorry.

23 Q. My question is: As far as you know,  
24 no one at Canal ever reached out to Ms. Robinson  
25 to coordinate the logistics of returning

1 inform him of what the ground rules are  
2 here?

3 MR. DROGIN: No, that's okay. If  
4 he's refusing to answer the question,  
5 he's refusing to answer the question.

6 MR. SANFORD: Well, he doesn't  
7 get to refuse to answer the question and  
8 you know that. So it is your obligation  
9 to inform him and educate him of what  
10 his obligations are here.

11 Can you do that, please?

12 THE WITNESS: I'm not --

13 MR. SANFORD: We'll go off the  
14 record. We'll go off the record.

15 THE WITNESS: You're going to say  
16 you had this money, therefore, can't you  
17 afford to give her that? No, I'm sorry,  
18 it's the principal of the thing.

19 BY MR. SANFORD:

20 Q. All right.

21 Well, the principal of the thing is  
22 going to be resolved by the court who is going  
23 to direct you to answer the question.

24 You understand that?

25 A. Well, then I'll wait for the court

1 to direct me and I gladly will do it. I feel  
2 you're just trying to harass me or get cheap  
3 answers or ask cheap answers. And I'm sorry, I  
4 don't like it.

5 Q. This is standard questions, though  
6 Mr. De Niro. Nothing unusual.

7 A. Well --

8 MR. DROGIN: Look, rather than  
9 going back and forth or arguing with the  
10 witness, he's told you that he's not  
11 going to answer the question. I cannot  
12 force him to answer the question. So I  
13 suggest we move on.

14 MR. SANFORD: I'm not asking you  
15 to force him to do anything. I'm asking  
16 you to educate your client as to what  
17 his obligations are in this deposition.  
18 If you're unwilling to do it, that's  
19 fine, but that's your obligation as his  
20 counsel.

21 MR. DROGIN: I don't take  
22 direction from you on how I practice.  
23 If you have a problem with the witness  
24 that he doesn't want to answer the  
25 question, you'll take it up with the

1 court and you can explain why you need  
2 to know the answer to that question,  
3 assuming the witness even knows the  
4 answer to that question.

5 BY MR. SANFORD:

6 Q. Mr. De Niro, your annual salary  
7 fluctuates based on how your businesses perform  
8 and how many film productions you're involved  
9 in, correct?

10 A. Yes.

11 Q. Do you know what you earned in 2021?

12 A. No.

13 Q. Do you know what you earned in 2020?

14 A. No.

15 Q. You filed for divorce from your  
16 ex-wife in 2018, correct?

17 A. Yes.

18 Q. Sorry?

19 A. Yes, I think that's when it was,  
20 yes.

21 Q. And in the divorce proceedings your  
22 former wife's lawyer or I guess your current  
23 wife's lawyer, Ms. Hightower, her lawyer told  
24 the judge that you had a net worth of about [REDACTED]  
[REDACTED].

1 Do you remember that?

2 A. I wish, I wish. That's what I mean,  
3 you're asking me -- from one cheap situation to  
4 another cheap situation. I wish. So you keep,  
5 you keep deluding yourself with that. You can  
6 say that. Okay.

7 MR. DROGIN: The question is  
8 simply if you know what her lawyer said.

9 THE WITNESS: I know he said  
10 something like that. It was ridiculous.

11 MR. DROGIN: Okay.

12 BY MR. SANFORD:

13 Q. All right.

14 Do you remember when her lawyer said  
15 that you had admitted that you had a net worth  
16 of [REDACTED]

17 A. No, I never admitted that.

18 Q. Your divorce lawyer reported in  
19 April of 2021 that you owe 18.25 million in  
20 income tax from 2018 to 2019, is that correct?

21 A. [REDACTED]  
[REDACTED]

23 Q. What did you represent in your  
24 divorce proceedings was your net worth?

25 A. I don't know. They did it. And I

1 don't -- I'm not -- I don't remember  
2 specifically.

3 Q. Was it more than a hundred million?

4 A. No. A hundred million, no.

5 Q. It was less than a hundred million?

6 A. I don't even know. I let them deal  
7 with that. I don't know.

8 Q. You don't want to answer the  
9 question, do you?

10 A. I don't want to answer, yes, because  
11 I feel like you're harassing me and you're  
12 trying to make a point, which I think is a cheap  
13 shot, yes.

14 Q. But you understand you're obliged to  
15 tell the truth --

16 A. Yes, and I will. When the judge  
17 tells me, I will. And then if I have to, of  
18 course, I will.

19 Q. And my question is simply: Was your  
20 net worth more than a hundred million as  
21 represented in your divorce proceedings?

22 MR. BENNETT: Objection.

23 MR. DROGIN: He said he doesn't  
24 recall.

25 A. Yes, I don't recall.

1 BY MR. SANFORD:

2 Q. You don't know, you don't know?

3 A. No.

4 Q. No, you have no idea what it is?

5 A. No, no.

6 Q. Was it more than [REDACTED]

7 A. Are you saying my net worth?

8 Q. Yes.

9 A. It is more than [REDACTED]

10 Q. More than [REDACTED]?

11 A. I'm not going any further.

12 Q. Somewhere between [REDACTED]?

13 A. I can't remember.

14 Q. You have no idea?

15 A. I have no idea.

16 MR. DROGIN: Objection to the  
17 form.

18 BY MR. SANFORD:

19 Q. And I'm not asking you what your net  
20 worth is right now, just to be clear. I'm  
21 asking what you represented in your divorce  
22 proceedings what your net worth is, right.

23 Do you know what your net worth is?

24 A. No, I don't know what they said. I  
25 don't know what they stated finally, no.

1 Q. Okay.

2 And you don't know what it is in  
3 fact right now?

4 A. No.

5 Q. You don't know whether it is more  
6 than a [REDACTED]

7 A. No.

8 Q. And you don't know whether it is  
9 more than [REDACTED]

10 A. No.

11 Q. You own Canal Productions, right?

12 A. Yes.

13 Q. You have 100 percent ownership stake  
14 in Canal Productions?

15 A. Yes, I think I do, but I might have  
16 another partner, but I'm not sure. It's been so  
17 long since we worked out the details of  
18 everything.

19 Q. Do you know how much money Canal  
20 made last year?

21 A. No.

22 Q. No idea?

23 A. Nope.

24 Q. Do you know how much you profit each  
25 year from your ownership in Canal?

1 A. No.

2 Q. Do you own most of Nobu Hospitality?

3 A. [REDACTED]

4 Q. What's your percentage interest in  
5 Nobu?

6 A. That's --

7 MR. BENNETT: Objection.

8 A. I'm sorry, I'm not going to answer  
9 that.

10 BY MR. SANFORD:

11 Q. You're not going to answer it why?

12 A. Because it is harassment. You're  
13 just trying to, you know, find a way. I'm  
14 sorry, I'm sorry.

15 MR. BENNETT: It is information  
16 designed to -- that question is designed  
17 to elicit has absolutely no bearing on  
18 this litigation.

19 A. Yes, no bearing on this case.

20 BY MR. SANFORD:

21 Q. It actually does.

22 A. No, even I as a layman know that.

23 Q. All right.

24 We'll find out what the judge  
25

1 thinks.

2 A. Right.

3 Q. You own most of TriBeCa Enterprises,  
4 right?

5 MR. BENNETT: Let's call the  
6 judge now.

7 BY MR. SANFORD:

8 Q. You own most of TriBeCa Enterprises?

9 A. [REDACTED]

10 Q. What percentage interest do you own  
11 of TriBeCa Enterprises?

12 A. I don't know.

13 Q. You have no idea?

14 A. No.

15 Q. What other companies do you own or  
16 have a controlling interest in?

17 MR. DROGIN: Objection to the  
18 form.

19 MR. BENNETT: Objection.

20 A. Yes.

21 BY MR. SANFORD:

22 Q. What other companies do you own or  
23 have a controlling interest in?

24 A. Well, I don't have a controlling  
25

1 interest. [REDACTED]  
 2 Q. Anything else?  
 3 A. That's it.  
 4 Q. TriBeCa?  
 5 A. TriBeCa.  
 6 Q. Anything else?  
 7 A. That's it.  
 8 Q. Do you own or control any companies  
 9 located outside of the United States?  
 10 A. No.  
 11 Q. You signed a pre-nup agreement with  
 12 your former wife, right?  
 13 MR. BENNETT: Objection.  
 14 A. [REDACTED]  
 15 BY MR. SANFORD:  
 16 Q. Is that correct?  
 17 A. [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 MR. BENNETT: Objection.  
 23 A. [REDACTED]  
 24 BY MR. SANFORD:  
 25 Q. [REDACTED]

1 [REDACTED]  
 2 A. I don't even remember exactly.  
 3 There's certain details.  
 4 Q. So you don't know what you wound up  
 5 giving your former wife as a result of the  
 6 divorce?  
 7 A. I'm, I'm working that out now.  
 8 Q. How much real estate do you own?  
 9 MR. DROGIN: Objection to the  
 10 form.  
 11 A. Yes, things here and there. What's  
 12 the point of the question?  
 13 BY MR. SANFORD:  
 14 Q. I just want to know if you own any  
 15 real estate and what they are?  
 16 A. I don't know.  
 17 Q. You don't know if you own real  
 18 estate?  
 19 A. I have some real estate in TriBeCa.  
 20 A country house -- a house in Long Island and a  
 21 house upstate. That's it.  
 22 Q. You have a house in Long Island, a  
 23 house upstate and what was the first thing you  
 24 mentioned?  
 25 A. [REDACTED]

1 [REDACTED]  
 2 Q. Do you know the value of those  
 3 floors in TriBeCa?  
 4 A. No, I don't.  
 5 Q. Do you know the value of your house  
 6 in Long Island?  
 7 A. No.  
 8 Q. Do you know the value of the house  
 9 in upstate New York?  
 10 A. No, I don't.  
 11 Q. You're an investor in numerous  
 12 businesses, aren't you?  
 13 MR. BENNETT: Objection.  
 14 A. [REDACTED]  
 15 [REDACTED]  
 16 BY MR. SANFORD:  
 17 Q. Do you have an investment in the  
 18 Greenwich Hotel?  
 19 A. [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 [REDACTED]  
 2 [REDACTED]  
 3 Q. What other companies have you  
 4 invested in?  
 5 A. That's it. I don't have any others  
 6 that I can see, that I know of.  
 7 Q. Do you own any stocks or mutual  
 8 funds or bonds?  
 9 A. No, no, no, no.  
 10 Q. Do you know how much money you have  
 11 on hand in cash in your bank accounts?  
 12 A. No.  
 13 Q. Do you know approximately how much?  
 14 A. No.  
 15 MR. DROGIN: Do you want to know  
 16 how much he has in his wallet?  
 17 A. Yes, I think I have \$200 in my  
 18 pocket.  
 19 BY MR. SANFORD:  
 20 Q. Do you own any gold or precious  
 21 metals?  
 22 A. No.  
 23 Q. Do you have any safety deposit  
 24 boxes?  
 25 A. No.

1 Q. Do you own any cars?  
 2 A. Not really. I lease them.  
 3 Q. You don't have any ownership  
 4 interest in any car?  
 5 A. No.  
 6 Q. How many cars do you lease?  
 7 A. A couple. I have one car maybe that  
 8 I own. It is a Telluride.  
 9 Q. Do you own any boats?  
 10 A. No.  
 11 Q. Any airplanes?  
 12 A. No.  
 13 Q. Helicopters?  
 14 A. No.  
 15 Q. Do you have any loans outstanding?  
 16 A. Not that I know of.  
 17 Q. Do you know how much money you gave  
 18 to charity last year?  
 19 A. I don't remember that either.  
 20 Q. No idea how much?  
 21 A. I don't think that's any of your  
 22 business.  
 23 MR. DROGIN: It's fine. He has  
 24 seven hours of questioning. If he wants  
 25 to ask these types of questions. They

1 have nothing to do with the case.  
 2 They're not objectionable. Let him  
 3 waste his time.  
 4 Just answer them, please.  
 5 BY MR. SANFORD:  
 6 Q. Did we get an answer?  
 7 MR. DROGIN: I'm sorry, we  
 8 couldn't hear you.  
 9 BY MR. SANFORD:  
 10 Q. I'm not sure we got an answer.  
 11 A. What was the question?  
 12 Q. If you gave any money to charity  
 13 last year?  
 14 A. I did, but I feel that's personal.  
 15 Q. So you're not going to answer the  
 16 question as to how much --  
 17 MR. BENNETT: I'm going to direct  
 18 him not to answer the question,  
 19 actually.  
 20 (Whereupon, the transcript  
 21 was marked for a direction not to  
 22 answer.)  
 23 MR. SANFORD: You're going to  
 24 direct him not to answer that question?  
 25 MR. BENNETT: Yes.

1 BY MR. SANFORD:  
 2 Q. Are you going to follow your  
 3 counsel's direction, Mr. De Niro?  
 4 A. Yes.  
 5 Q. You're going to follow your  
 6 counsel's direction?  
 7 A. Yes, I am.  
 8 Q. Okay.  
 9 MR. SANFORD: Mr. De Niro, it is  
 10 now 2:27 --  
 11 THE WITNESS: Yes.  
 12 MR. SANFORD: -- and as an  
 13 accommodation, I'm going to tell you  
 14 something here that you may or may not  
 15 know.  
 16 As an accommodation to you and  
 17 given the request of your counsel, I  
 18 have agreed to do something I normally  
 19 don't do, which is to split your  
 20 deposition in two days. So I understand  
 21 you have some personal issues to attend  
 22 to.  
 23 THE WITNESS: Yes, I do.  
 24 MR. SANFORD: I'm going to  
 25 respect that commitment that you have

1 and end today's deposition. We're  
 2 scheduled to come back tomorrow at 10:00  
 3 a.m. in the morning and we're scheduled  
 4 to do again until 2:30 tomorrow.  
 5 And at that point we'll take  
 6 stock and see where we are and see if a  
 7 third day may be necessary. I don't  
 8 know if it will or won't. I try to be  
 9 efficient and I try to get through the  
 10 material that is good for everyone.  
 11 So I thank you for showing up  
 12 today. I look forward to seeing you  
 13 tomorrow. I wish you well with your  
 14 commitments this afternoon.  
 15 THE WITNESS: Okay.  
 16 Thank you.  
 17 MR. BENNETT: Bob, you can log  
 18 out.  
 19 MR. DROGIN: Can we just get a  
 20 running time on the record, total time  
 21 on, please?  
 22 THE VIDEOGRAPHER: Yes, I'll have  
 23 to tally it, though, give me one minute.  
 24 MR. DROGIN: All right.  
 25 Bob, you can, you can sign off.

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1 THE WITNESS: Thank you. Thank  
2 you.

3 MS. HARWIN: Chris, have you  
4 taken us off the record?

5 THE VIDEOGRAPHER: The time is  
6 2:29. We are going off the record.

7 THE COURT REPORTER: Counsel,  
8 would you like to order a copy of the  
9 transcript?

10 MR. BENNETT: Yes, please.

11 (Whereupon, at 2:29 o'clock  
12 p.m., the deposition was adjourned.)  
13  
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## 1 INSTRUCTIONS TO WITNESS

2  
3 Read your deposition over carefully. It is  
4 your right to read your deposition and make  
5 changes in form or substance. You should assign a  
6 reason in the appropriate column on the errata  
7 sheet for any change made.

8 After making any change in the form or  
9 substance, and which have been noted on the  
10 following errata sheet, along with the reason for  
11 any change, sign your name on the errata sheet and  
12 date it.

13 Then sign your deposition at the end of your  
14 testimony in the space provided. You are signing  
15 it subject to the changes you have made in the  
16 errata sheet, which will be attached to the  
17 deposition before filing. You must sign it in  
18 front of a notary public. Any competent adult may  
19 witness your signature.

20 Return the original errata sheet to the court  
21 reporter promptly. Court rules require filing  
22 within 30 days after you receive deposition.  
23  
24  
25

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## 1 ERRATA SHEET

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## 1 SIGNATURE PAGE

2 OF

3 ROBERT DE NIRO

4  
5 I hereby acknowledge that I have read the  
6 foregoing deposition, dated April 4, 2022, and  
7 that the same is a true and correct transcription  
8 of the answers given by me to the questions  
9 propounded, except for the changes, if any, noted  
10 on the attached errata sheet.  
11  
12

13 SIGNATURE: \_\_\_\_\_

14 WITNESSED BY: \_\_\_\_\_

15 DATE: \_\_\_\_\_  
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63 (Pages 246 to 249)



CERTIFICATE  
STATE OF NEW JERSEY)  
)SS:  
COUNTY OF MONMOUTH )

I, CATHERINE M. DONAHUE, a Certified Court  
Reporter and Notary Public within and for the  
State of New Jersey, do hereby certify:

That the witness whose deposition is  
hereinbefore set forth was duly sworn by me and  
that such deposition is a true record of the  
testimony given by such witness.

I further certify that I am not related to  
any of the parties to this action by blood or  
marriage, and that I am in no way interested in  
the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my  
hand this 5th day of April, 2022.


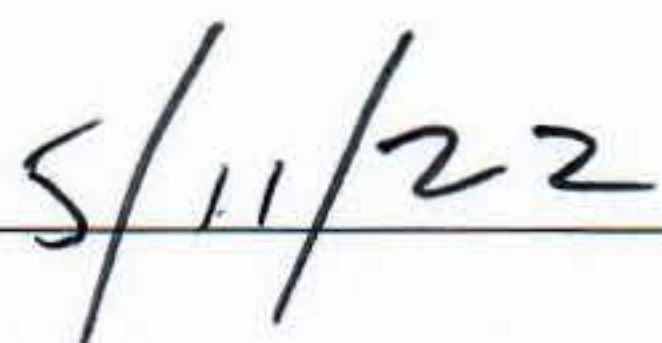
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## SIGNATURE PAGE

OF

ROBERT DE NIRO

I hereby acknowledge that I have read the foregoing deposition, dated April 4, 2022, and that the same is a true and correct transcription of the answers given by me to the questions propounded, except for the changes, if any, noted on the attached errata sheet.

SIGNATURE: WITNESSED BY: DATE: 

THOMAS A. HARVEY  
Notary Public, State of New York  
No. 02HA6051878  
Qualified in Westchester County  
Commission Expires December 4, 2022

